

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

INDEX NO.

KWAIN THOMPSON

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PLAINTIFF

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-AGAINST-

DETECTIVE JAMES QUILTY, DETECTIVE JOHN DOE# 1 , DETECTIVE JOHN DOE # 2  
GINA RANDELL, ASSISTANT D.A JAILE CAITLYN ( PROSECUTOR) CITY OF NEW YORK  
OFFICER BERNIER, OFFICER KENOL, OFFICER MASON, CAPTAIN JONES, DOCTOR BALAM  
CITY HEALTH AND HOSPITALS, OFFICER LEITCH, OFFICER WALKER, DOCTOR ASKARI  
ASSISTANT DISTRICT ATTORNEY MS. BREEN, NURSE MS BLOUNT, CORRECTION RUSSEL  
CORRECTION OFFICER PIERCE SHERMA DUNBAR WARDEN, DEFENDANTS(S)  
INDIVIDUAL AND OFFICIAL CAPACITIES WARDEEN RENEE

1983 COMPLAINT  
PURSUANT TO TITLE 18 & 42 OF

UNITED STATES CODES

1. PLAINTIFF COMMENCES THIS ACTION PURSUANT TO 42 U.S.C & 1983 SEEKING COMPENSATORY AND PUNITIVE DAMAGES AGAINST DEFENDANTS, DETECTIVE JAMES QUILTY OF THE N.Y.P.D, DETECTIVE JOHN DOE OF THE N.Y.P.D#1, DETECTIVE JACK DOE OF THE N.Y.P.D#2, GINA RANDELL, ASSISTANT DISTRICT ATTORNEY JAILE CAITLYN (PROSECUTOR), ASSISTANT DISTRICT ATTORNEY MS.BREEN, THE CITY OF NEW YORK, CORRECTION OFFICER BERNIER, CORRECTION OFFICER KENOL, CORRECTION OFFICER MASON, CORRECTION OFFICER CAPTAIN JONES, DOCTOR BALAM DOCTOR ASKARI, CITY HEALTH AND HOSPITAL; CORRECTION OFFICER LEETCH, CORRECTION OFFICER WALKER, FOR VIOLATING MY CONSTITUTIONAL RIGHTS WHILE ACTING UNDER COLOR OF LAW
2. PLAINTIFF ALSO ASSERTS SUPPLEMENTAL STATE LAW CLAIMS AGAINST THE CITY OF NEW YORK, CITY HEALTH AND HOSPITALS AND DEFENDANTS CORRECTION OFFICER LEETCH, CORRECTION OFFICER WALKER, CORRECTION

CORRECTION OFFICER KENOL, CORRECTION OFFICER MASON, CORRECTION OFFICER BERNIER, CORRECTION OFFICER CAPTAIN JONES, DETECTIVE JAMES QUILTY, DETECTIVE JOHN DOE#1, DETECTIVE JOHN DOE#2, DOCTOR ASKARI, DOCTOR BALAM, GINA RANDELL, ASSISTANT DISTRICT ATTORNEY JAILE CAITLYN, ASSISTANT DISTRICT ATTORNEY MS. BREEN, FOR VIOLATIONS OF THEIR STATUTORY AND COMMON LAW DUTIES, AS WELL AS CLAIMS OF SEXUAL ASSAULT AND ABUSE, NEGLIGENCE, NEGLIGENT HIRING, TRAINING, SUPERVISION AND RETENTION, INTENTIONAL AND NEGLIGENT INFLECTION OF EMOTIONAL DISTRESS, AND VIOLATIONS OF NEW YORK CITY ADMINISTRATIVE CODE & 10-1101 et seq.

3. AT ALL TIMES ALLEGED HEREIN, PLAINTIFF WAS AND REMAINS A PRETRIAL DETAINEE CONFINED TO THE CUSTODY, CONTROL, AND CARE OF THE CITY OF NEW YORK AT ITS DEPARTMENT OF CORRECTIONS' VARIOUS JAILS, WHO HAS BEEN REPEATEDLY SEXUALLY ASSAULTED AND ABUSED AND FORCIBLY TOUCHED WITHOUT HIS CONSENT BY DEFENDANTS CORRECTION OFFICER BERNIER, CORRECTION OFFICER MASON, CORRECTION OFFICER KENOL,

4. NEW YORK STATE HAS LONG RECOGNIZED THE COERCIVE POWER CORRECTION OFFICERS WIELD OVER INCARCERATED INDIVIDUALS, AND THE RELATED RISK OF RAPE AND OTHER SEXUAL ABUSE, BY CRIMINALIZING ALL SEXUAL ACTIVITY BETWEEN INCARCERATED INDIVIDUALS AND CORRECTIONAL STAFF IN NEW YORK PENAL LAW & 130.05(3)(F), NEW YORK PENAL LAW & 130.25(1), AND NEW YORK PENAL LAW & 130.40(1). THE CITY OF NEW YORK IS AWARE THAT NEW YORK STATE HAS IDENTIFIED A SIGNIFICANT RISK OF SEXUAL COERCION OF INDIVIDUALS IN CUSTODY, BUT IT NONETHELESS PERMITS A CULTURE OF SYSTEMIC SEXUAL ABUSE AND VICTIMIZATION OF PRISONERS TO EXIST IN ITS FACILITIES.

5. THE PERVASIVE CULTURE OF SEXUAL ABUSE AND VICTIMIZATION OCCURRING IN DOC FACILITIES AND CLINICS IS COMMON KNOWLEDGE WITHIN AND WITHOUT THE FACILITIES. CORRECTION OFFICERS AND CLINIC STAFF NOT ONLY KNOW THAT PRISONERS ARE REGULARLY ABUSED, BUT ALSO WHICH OFFICERS AND STAFF COMMITS THE ABUSES, WHICH TYPE OF PRISONERS ARE MOST OFTEN ABUSED, AND WHEN AND WHERE THE ABUSES OCCUR.

JURISDICTION AND VENUE

6., JURISDICTION OF THIS COURT IS INVOKED PURSUANT TO 28 U.S.C. & 1331 AND 1343(a)(3) AND (4) AND THE AFORESAID STATUTORY AND CONSTITUTIONAL PROVISIONS.

7. PURSUANT TO 28 U.S.C. & 1367, THIS COURT HAS SUPPLEMENTAL JURISDICTION OVER CLAIMS WHICH ARISE UNDER THE RELEVANT PROVISIONS OF NEW YORK STATE LAW.

8. VENUE IS APPROPRIATE IN THIS COURT PURSUANT TO 28 U.S.C. & 139(b)(2). AS A SUBSTANTIAL PART OF THE EVENTS OR OMISSIONS GIVING RISE TO THIS CLAIM OCCURED WITHIN BRONX COUNTY, NEW YORK, WHICH IS WITHIN THIS JUDICIAL DISTRICT.

PARTIES

9. AT ALL TIMES MENTIONED HEREIN, THE PLAINTIFF WAS AND REMAIN A RESIDENT OF THE STATE OF NEW YORK.

10. AT ALL TIMES MENTIONED HEREIN, THE PLAINTIFF WAS AND REMAINS A PRETRIAL DETAINEE CONFINED TO THE CUSTODY, CONTROL, AND CARE OF DEFENDANT CITY OF NEW YORK AND ITS DEPARTMENT OF CORRECTIONS, AS WELL AS THE MANHATTAN DISTRICT ATTORNEY OFFICE, AS WELL AS THE NEW YORK POLICE DEPARTMENT. AS WELL AS THE CITY HEALTH AND HOSPITALS CORPORATION.

10. UPON INFORMATION AND BELIEF, AND AT ALL TIMES MENTIONED HEREIN, THE DEFENDANTS, CITY OF NEW YORK (HEREINAFTER REFERRED TO AS "CITY" ), THE N.Y.P.D AND THE CITY HEALTH AND HOSPITALS, AS WELL AS THE MANHATTAN DISTRICT ATTORNEY OFFICE, WAS AND REMAINS A BODY CORPORATE AND POLITIC, CONSTITUTING A MUNICIPAL CORPORATIONS, DULY ORGANIZED AND EXISTING UNDER AND BY VIRTUE OF THE LAWS OF THE STATE OF NEW YORK

12. UPON INFORMATION AND BELIEF, AND AT ALL TIMES ;;MENTIONED HEREIN, DEFENDANT CITY MAINTAINS THE CITY OF NEW YORK DEPT OF CORRECTIONS (HEREINAFTER REFFERRED TO AS THE "DOC" ), PURSUANT TO LAW.

13. AT ALL TIMES MENTIONED HEREIN, DEFENDANT CORRECTION OFFICER PIERCE WAS A CORRECTION OFFICER EMPLOYED BY THE CITY OF NEW YORK.

14. AT ALL TIMES MENTIONED HEREIN, DEFENDANT C.O. PIERCE WAS ACTING UNDER COLOR OF LAW. DEFENDANT C.O. PIERCE IS BEING SUED IN ~~HER~~ HIS INDIVIDUAL AND OFFICIAL CAPACITIES.

15. AT ALL TIMES MENTIONED HEREIN, DEFENDANT CORRECTION OFFICER KENOL WAS A CORRECTION OFFICER EMPLOYED BY THE CITY OF NEW YORK.

16. AT ALL TIMES MENTIONED HEREIN, DEFENDANT C.O. KENOL WAS ACTING UNDER COLOR OF LAW. DEFENDANT C.O. KENOL IS BEING SUED IN HER INDIVIDUAL AND OFFICIAL CAPACITIES.

~~17. AT ALL TIMES MENTIONED HEREIN, DEFENDANT CORRECTION OFFICER MASON~~  
(HEREINAFTER, C.O. MASON) WAS A CORRECTION OFFICER EMPLOYED BY THE CITY OF NEW YORK.

~~18. AT ALL TIMES MENTIONED HEREIN, DEFENDANT C.O. MASON WAS ACTING UNDER~~  
COLOR OF LAW. DEFENDANT C.O. MASON IS BEING SUED IN HER INDIVIDUAL AND OFFICIAL CAPACITIES.

19. AT ALL TIMES MENTIONED HEREIN, DEFENDANT CORRECTION OFFICER BERNIER (HEREINAFTER C.O. BERNIER) WAS A CORRECTION OFFICER EMPLOYED BY THE CITY OF NEW YORK.

20. AT ALL TIMES MENTIONED HEREIN, DEFENDANT C.O. BERNIER WAS ACTING UNDER COLOR OF LAW. DEFENDANT C.O. BERNIER IS BEING SUED IN HER INDIVIDUAL AND OFFICIAL CAPACITIES.

21. AT ALL TIMES MENTIONED HEREIN, DEFENDANT CORRECTION OFFICER LEECH (HEREINAFTER C.O. LEECH) WAS A CORRECTION OFFICER EMPLOYED BY THE CITY OF NEW YORK.

22. AT ALL TIMES MENTIONED HEREIN, DEFENDANT LEECH WAS ACTING UNDER COLOR OF LAW. DEFENDANT C.O. LEECH IS BEING SUED IN HER INDIVIDUAL AND OFFICIAL CAPACITIES.

23. AT ALL TIMES MENTIONED HEREIN, DEFENDANT CORRECTION OFFICER WALKER (HEREINAFTER C.O. WALKER) WAS A CORRECTION OFFICER EMPLOYED BY THE CITY OF NEW YORK.

24. AT ALL TIMES MENTIONED HEREIN, DEFENDANT C.O. WALKER WAS ACTING UNDER COLOR OF LAW. DEFENDANT C.O. WALKER IS BEING SUED IN HER INDIVIDUAL AND OFFICIAL CAPACITIES.

25. AT ALL TIMES MENTIONED HEREIN, DEFENDANT CAPTAIN CORRECTION OFFICER JONES (HEREINAFTER CAPT. JONES ) WAS A CORRECTION OFFICER EMPLOYED BY THE CITY OF NEW YORK.

26. AT ALL TIMES MENTIONED HEREIN, DEFENDANT CAPT, JONES WAS ACTING UNDER THE COLOR OF LAW. DEFENDANT CAPT, JONES IS BEING SUED IN HER INDIVIDUAL AND OFFICIAL CAPACITIES.

27. AT ALL TIMES MENTIONED HEREIN, DEFENDANT NURSE BLOUNT WAS A NURSE WHO WORK IN G.R.V.C BUILDING ON RIKERS ISLAND AND WAS EMPLOYED BY THE CITY OF NEW YORK.

28. AT ALL TIMES MENTIONED HEREIN, DEFENDANT NURSE BLOUNT WAS ACTING UNDER THE COLOR OF LAW. DEFENDANT NURSE BLOUNT IS BEING SUED IN HER INDIVIDUAL AND OFFICIAL CAPACITIES.

29. AT ALL TIMES MENTIONED HEREIN, DEFENDANT DOCTOR BALAM WAS A DOCTOR WHO WORKED IN G.R.V.C BUILDING ON RIKERS ISLAND AND WAS EMPLOYED BY THE CITY OF NEW YORK.

30. AT ALL TIMES MENTIONED HEREIN, DEFENDANT DOCTOR BALAM WAS A DOCTOR WHO WAS ACTING UNDER THE COLOR OF LAW. DEFENDANT DOCTOR BALAM IS BEING SUED IN HIS INDIVIDUAL AND OFFICIAL CAPACITIES.

31. AT ALL TIMES MENTIONED HEREIN, DEFENDANT CORRECTION OFFICER RUSSEL ( HEREINAFTER C.O. RUSSEL ) WAS A CORRECTION OFFICER EMPLOYED BY THE CITY OF NEW YORK.

32. AT ALL TIMES MENTIONED HEREIN, DEFENDANT C.O. RUSSEL WAS ACTING UNDER COLOR OF LAW. DEFENDANT C.O. RUSSEL IS BEING SUED IN HER INDIVIDUAL AND OFFICIAL CAPACITIES.

33. AT ALL TIMES MENTIONED HEREIN ASKARI DEFENDANT WAS A DOCTOR INSIDE G.R.V.C BUILDING AND WAS A DOCTOR EMPLOYED BY THE CITY OF NEW YORK.

34. AT ALL TIMES MENTIONED HEREIN, DEFENDANT ASKARI WAS ACTING UNDER COLOR OF LAW. DEFENDANT ASKARI IS BEING SUED IN HIS INDIVIDUAL AND OFFICIAL CAPACITIES

35. At ALL TIMES MENTIONED HEREIN, DEFENDANT DETECTIVE JAMES QUILTY AN N.Y.P.D OFFICER FROM THE MANHATTAN 32ND PRECINT, WAS AN ~~XXXXXXX~~ NEW YORK CITY POLICE OFFICER EMPLOYED BY THE CITY OF NEW YORK.

36. AT ALL TIMES MENTIONED HEREIN, DEFENDANT DETECTIVE JAMES QUILTY WAS ACTING UNDER COLOR OF LAW. DEFENDANT JAMES QUILTY IS BEING SUED IN HIS INDIVIDUAL AND OFFICIAL CAPACITIES.

37. AT ALL TIMES MENTIONED HEREIN, DEFENDANT JOHN DOE #1 IS AN N.Y.P.D DETECTIVE WHO WORK AT THE MANHATTAN 32ND PRECINT UNDER JAMES QUILTY WHO WAS THE LEAD DETECTIVE, DETECTIVE JOHN DOE #1 WAS AN NEW YORK CITY POLICE OFFICER EMPLOYED BY THE CITY OF NEW YORK.

38. AT ALL TIMES MENTIONED HEREIN, DEFENDANT DETECTIVE JOHN DOE # 1 WAS ACTING UNDER COLOR OF LAW. DEFENDANT JOHN DOE #1 IS BEING SUED IN HIS INDIVIDUAL AND OFFICIAL CAPAQITIES.

39. AT ALL TIMES MENTIONED HEREIN, DEFENDANT JOHN DOE #2 IS AN N.Y.P.D DETECTIVE WHO WORK AT THE MANHATTAN 32ND PRECINT UNDER JAMES QUILTY WHO WAS THE LEAD DETECTIVE, DETECTIVE JOHN DOE #2 WAS A NEW YORK CITY POLICE OFFICER EMPLOYED BY THE CITY OF NEW YORK.

40. AT ALL TIMES MENTIONED HEREIN, DEFENDANT DETECTIVE JOHN DOE #2 IS BEING SUED IN HIS INDIVIDUAL AND OFFICIAL CAPACITIES.

41. AT ALL TIMES MENTIONED HEREIN, DEFENDANT ASSISTANT DISTRICT ATTORNEY MS. BREEN, WHO WORK FOR MANHATTAN DISTRICT ATTORNEY OFFICE, WAS A NEW YORK CITY PROSECUTOR WHO WAS EMPLOYED BY THE CITY OF NEW YORK.

42. AT ALL TIMES MENTIONED HEREIN, DEFENDANT MS. BREEN IS BEING SUED IN HER INDIVIDUAL AND OFFICIAL CAPACITIES.

43. AT ALL TIMES MENTIONED HEREIN, DEFENDANT ASSISTANT DISTRICT ATTORNEY JAILE CAITLYN, WHO WORK FOR MANHATTAN DISTRICT ATTORNEY OFFICE, WAS A NEW YORK CITY PROSECUTOR WHO WAS EMPLOYED BY THE CITY OF NEW YORK.



44. AT ALL TIMES MENTIONED HEREIN, DEFENDANT JAILE CAITLYN IS BEING SUED IN HER INDIVIDUAL AND OFFICIAL CAPACITIES.

45. AT ALL TIMES MENTIONED HEREIN, DEFENDANT GINA RANDELL IS A RESIDENT OF NEW YORK CITY, AND HAS ONGOING PENDING LAWSUITS AGAINST VARIOUS ENTITIES.

45. AT ALL TIMES MENTIONED HEREIN, DEFENDANT GINA RANDELL IS BEING SUED IN HER INDIVIDUAL AND OFFICIAL CAPACITIES, AND HER ADDRESS IS 127-03 20TH AVENUE, QUEENS, NY, 11356

47. AT ALL TIMES MENTIONED HEREIN, AND UPON INFORMATION AND BELIEF, DEFENDANTS C.O. LEECH AND C.O. WALKER WAS ESCORT OFFICERS ASSIGNED TO ESCORT PLAINTIFF TO LAW LIBRARY FROM HOUSING UNIT IN G.R.V.C TO USE KIOSK TO DO LEGAL RESEARCH.

48. AT ALL TIMES MENTIONED HEREIN, AND UPON INFORMATION AND BELIEF C.O. CAPTAIN JONES WAS ASSIGNED TO HOUSING UNIT 2/A IN G.R.V.C AND WAS THE THE ESCORT CAPTAIN WHO WAS TO SEE I GET TO MY SCHEDULE CLINIC APPOINTMENTS, AND TO ESCORT ME TO JUMAH SERVICES AS WELL AS VISITS.

49. AT ALL TIMES MENTIONED HEREIN, AND UPON INFORMATION AND BELIEF, DEFENDANTS C.O. MASON, C.O. KENOL, C.O. PIERCE, WAS ASSIGNED AS STEADY OFFICERS IN THE 2/A HOUSING UNIT IN G.R.V.C, THESE THREE OFFICER TOLD ME THEY GOT A PROGRAM OF SEXUAL FAVORS IN RETURN FOR TIME OUTSIDE ~~MY~~ MY CELL, SINCE I'M COURT-ORDER TO BE INSIDE MY CELL FOR 23/HOURS OUT THE DAY. THEY ALSO TOLD ME AS LONG AS I STICK TO THE PROGRAM, I WILL ALWAYS HAVE PERKS, OF EXTRA FOOD, AND EXTRA TIME ON THE VISITS, THEY TOLD ME THEY WILL MAKE SURE I GET MY MEDICATIONS ON TIME, AND I GO TO MUSLIM SERVICES AND THEY WILL MAKE SURE I GET MY LAW LIBRARY SERVICES. ALL THIS IN EXCHANGE FOR SEX.

50. AT ALL TIMES MENTIONED HEREIN, C.O. RUSSEL WAS THE MEDICATION OFFICER IN THE G.R.V.C. JAIL AND ASSIGNED TO ESCORT ME TO THE CLINIC.

51. STATEMENT OF FACTS

52. BEGINNING ABOUT IN OR ABOUT MARCH/1/2019 AND CONTINUING TO PRESENT DAY OF AGUST/ 10/ 2022 PLAINTIFF WAS LIED UPON BY HIS EX-GIRLFRIEND GINA RANDELL

SHE TOLD THE COPS THAT I HAD ASSAULTED HER AND ROBBED HER ON THE 6TH/ OF OCTOBER/2018. SHE TOLD THE DETECTIVE JAMES QUILTY, WHICH INTURN JAMES QUILTY TOLD HER THAT HE KNOWS SHE'S LYING BUT HE CAN HELP HER SEEK REVENGE BY HELP FRABRICATE THE CHAIN OF EVENTS AND HELP GET RID OF EVIDENCE THAT WILL HELP THE DEFENDANT, AND ALSO JAMES QUILTY TOLD GINA RANSDALL THAT HE GOT PEOPLE INSIDE THE MANHATTAN DISTRICT ATTORNEY OFFICE WHO WILL HELP STEER THE GRAND JURY TO INDICT KWAIN THOMPSON, I KWAIN THOMPSON WAS ARRESTED ON MARCH/1/2019 AND 6 MONTHS LATER GINA RANSDALL CAME TO VISIT ME AT RIKER'S ISLAND AND TOLD ME THAT SHE WAS SO SORRY FOR HAVING ME FALSELY ARRESTED, BUT IT WAS VERY EASY TO FABRICATE THE LIE BECAUSE THE DETECTIVE JAMES QUILTY DON'T LIKE MINORITIES AND PROSECUTOR JAILE CAITLYN DON;'T LIKE BLACK MEN, AND SHE TOLD ME THAT HER ANGER IS GONE TOWARDS ME, SHE IS GOING TO TELL THE TRUTH TO GET THE CASE DISMISSED. SO SHE MADE A VIDEO CONFESSION TO PRIVATE INVESTIGATOR, MR. GAZZOLA. I GAVE THIS VIDEO TO THE PROSECUTOR LAST AGUST OF 2021 AND I WAS NOT RELEASED, FOR REASON OF MALICIOUS PROSECUTION ,ALSO GINA RANSDALL STATED ON VIDEO CAMERA THAT SHE LIED BECAUSE SHE WAS JELOUS OF MY NEW RELATIONSHIP, AND SHE WAS A WOMAN SCORN, SHE KNEW EXACTLY WHAT TO SAY AND DO TO GET ME IN TROUBLE AND SHE DID IT, WITH THE HELP OF THE N.Y.P.D DETECTIVES JAMES QUILTY, DETECTIVE JOHN DOE #1 AND DETECTIVE JOHN DOE #2 AND WITHE HELP OF MANHATTAN PROSECUTORS JAILE CAITLYN AND PROSECUTOR MS. BREEN. SINCE MY LOCK-UP AT THE NOTORIOUS RIKER'S ISLAND I WAS PULLED IN BY A SEX CULT THAT'S BENEN RAMPANT AT G.R.V.C AND I HAVE BEEN ON COURT-ORDER STATUS, WHICH MEANS I'M LOCK IN MY CELL FOR 23/HOURS OUT THE DAY/ 365, I WAS TOLD BY C.O. PIERCE THAT HE LIKE TO GET FLASH WITH PENIS AND HE LIKE SEX TALK EVERY ONCE IN AWHILE, HE TOLD IF I CAN OBLIGED HIM I WILL BE LET OUT MY CELL ATLEAST 12 HOURS OUT THE DAY, NO MATTER WHAT SUPERVISOR IS AROUND, AND HE THEN TOLD ME ABOUT THE OTHER THREE STEADY OFFICERS , WHO LIKE TO FONDLE DICK AND GET FLASH AND WILL KEEP ME OUT MY CELL FOR ATLEAST 12/HOURS OUT THE DAY.,C.O. KENOL,C.O.MASON, C.O. BERNIER



C.O. RUSSELL, C.O. WALKER, C.O. LEECH, C.O. CAPTAIN JONES, NURSE MS. BLOUNT, DOCTOR BALAM, DOCTOR ASKARI. PLAINTIFF WAS REGULARLY AND ROUTINELY SEXUALLY ABUSED, VICTIMIZED, AND HARRASED BY DEFENDANTS, C.O. CAPTAIN JONES, C.O. MASON C.O. BERNIER, C.O. KENOL, C.O. PIERCE, ON SEPARATE BUT NUMEROUS OCCASIONS IN THE HOUSING UNIT 2/A BY CAPTAIN JONES IN THE G.R.V.C JAIL, G.R.V.C

STANDS FOR ( GEORGE.R.VIERNO.CENTER ) ON RIKER'S ISLAND. AND ELSEWHERE WITHIN THE G.R.V.C FACILITY.

53. AS OF A RESULT OF ME SUING CAPTAIN CATER AND WARDEN RENEE, IN A SEPARATE LAWSUIT WHO IS BEING HANDLE BY MY ATTORNEY FROM THE HELD & HINES LAWFIRM, I'M EXPERIENCING EXTREME RETAILIATION FROM CORRECTION OFFICERS AND STAFF, HERE AT G.R.V.C

54. ON OR ABOUT OCTOBER 7/ 2021 DEFENDANTS C.O. PIERCE INTRODUCE ME TO THE HOUSING UNIT 2/A PROGRAM AND AS LONG AS I COOPERATE I WILL NOT HAVE TO SPEND 23/HOURS IN MY CELL, BUT I MUST ALSO TAKE CARE OF C.O BERNIER, AND C.O. MASON C.O. KENOL, HE TOLD ME THAT IF I FOLLOW THE PROGRAM I COULD GET DRUGS, LAW LIBRARY, CIGARETTES, EXTRA TIME ON THE VISIT FLOOR, EXTRA FOOD, BUT I MUST PLEASE SEXUALLY THE SAID OFFICER DESIRES, AND I DID FOR OVER 9 MONTHS, THEN I STOP WANTING TO GIVE MY BODY AWAY AND THAT'S WHEN THEY CAME DOWN HARD ON ME, I WAS LOCKED IN MY CELL, I HAD NUMEROUS SUICIDE ATTEMPTS, MY JOB WAS TAKEN AWAY, , MY VISITS WAS TAKEN AWAY TOTALLY, AND MY MEDICAL APPOINTMENTS WAS DENIED. ITS BEEN TOTAL HELL SINCE I STOP GIVING INTO THIER SEXUAL CRAVINGS. THEY CHANGED MY PIN NUMBER SO I CAN'T MAKE A 311 COMPLAINT CALL TO ALERT THE CITY OF WHAT'S GOING ON INSIDE THIS JAIL. THEY MADE SURE I CAN'T CALL THE P.R.E.A HOTLINE TO REPORT THE SEXUAL ABUSE THAT'S RAMBANT INSIDE THE NOTORIOUS RIKER'S ISLAND, P.R.E.A. STANDS FOR THE PRISONER ~~XXXXXX~~ RAPE ELIMINATION ACT, EVERY INMATE IS ALLOWED TO CALL THAT NUMBER EXCEPT ME, ALL BECAUSE I CHOSD TO TAKE A STAND AND NOT GET SEXUALLY ABUSE ANYMORE. 311 CALL IS ANOTHER NUMBER EVERY INMATE CAN CALL TO FILE A COMPLAINT, EXCEPT ME, BECAUSE I DON'T WANT TO FOLLOW THE PROGRAM, ALSO 614 IS ANOTHER NUMBER

614 IS THE MEDICAL HOTLINE EVERY INMATE IS ALLOWED TO CALL THIS NUMBER EXCEPT ME, I COULD NOT CALL TO REPORT MY SICKNESS AND I COULD NOT CALL FOR MY MENTAL HEALTH ISSUES, ON MANY DAYS AND NIGHTS THOUGHTS RAN ACROSS MY MIND JUST TO KILL MYSELF AND END MY LIFE SO I CAN STOP USING MY BODY FOR OFFICERS GRATIFICATION.

55. PLAINTIFF DID NOT WANT TO HAVE SEX OR FLASH OR TALK NASTY TO C.O. PIERCE, C.O. MASON, C.O. BERNIER, C.O. KENOL

56. PLAINTIFF DID NOT CONSENT TO HAVING SEX WITH DEFENDANTS C.O. PIERCE, C.O. MASON, C.O. BERNIER, C.O. KENOL.

57. BETWEEN OCTOBER/8/2021 AND AGUST/10/2022 PLAINTIFF HAD TO PULL HIS PANTS DOWN INSIDE HIS CELL, SLOP SINK, AND JANITORS CLOSET IN HOUSING UNIT 2/A IN G.R.V.C AND TALK NASTY OVER 1000 TIMES FOR C.O. MASON, C.O. PIERCE, C.O. KENOL, C.O. BERNIER.

58. ON NUMEROUS OCCASSIONS, DEFENDANTS C.O. PIERCE, C.O. MASON, C.O. KENOL C.O. BERNIER, THREATEN PLAINTIFF THAT HE REFUSED TO FOLLOW THE PROGRAM THAT HE WIL;L BE LOCKED IN HIS CELL LIKE THE COURT - ORDER- STATES, AND I WILL NO LONGER GET VISITS, AND THAT THEY WILL MAKE SURE I WON'T BE ABLE TO CALL 311 TO MAKE A COMPLAINT, AND THAT I WON'T BE ABLE TO MAKE A CALL TO THE 614 # TO CALL FOR MEDICAL, AND I WILL NOT GET BROUGHT TO THE LAW LIBRARY TO TALK TO ANY LEGAL COORDINATOR TO HELP IN MY CRIMINAL CASE. AND I WILL NOT GET MY MEDICATION ON TIME TWICE A DAY, AND I WILL NOT BE TAKEN TO MUSLIM SERVICES., AND I NUMEROUS OCCASIONS I WAS THREATEN THAT I WILL NOT BE GIVEN FOOD OR HAIL. ON AUGUST/7/2022 I HAD A VIDEO VISIT FROM TANYA COOPER FROM NORFOLK, VA, AT 8AM, AFTER 6 MINUTES THE VISIT WAS TERMINATED BECAUSE I DID NOT FOLLOW THE PROGRAM BY HAVING TO EXPOSE MYSELF TO C.O. PIERCE, AT 2:30PM THE SAME DAY, OFFICER VELEZ A POST OFFICER TOLD ME THAT IF I DROPPED THE LAWSUITS I WILL BE ABLE TO GET MY VISITS BACK, OR JUST HAVE SEX WITH PIERCE. I FEEL LIKE KILLING MYSELF SINCE I CAN'T SEE MY FAMILY INLESS I SEXUALLY PERFORM FOR THESE OFFICERS. ON AGUST/6/2022 C.O. PIERCE CAME TO MY CELL TO TELL ME HE WILL LET ME BACK OUT MY CELL IF I CONTINUE

TO FOLLOW HIS PROGRAM, I FELT I WAS LEFT WITH NO CHOICE SO FROM INSIDE MY CELL I MASTURBATED INFRONT OF PIERCE FOR OVER 30 MINUTES UNTIL I EJACULATED. I FELT SO MUCH SHAME. AND RIGHT AFTERWARDS I WAS ABLE TO COME OUT MY CELL DURING THE HEAT WAVE. IT FELT LIKE 100 DEGREES INSIDE THE CELL, WITH NO AIR CONDITIONER, I'M A HEAT SENSITIVE INMATE, AND I WAS TOLD BY C.O. PIERCE AND C.O. MASON, THAT AS LONG AS I GOT A LAWSUIT PENDING Against WARDEN RENNE, AND CAPTAIN CARTER, THEY WILL NOT MOVE ME TO HEAT SENSITIVE HOUSING, BUT IF I CAN CONTINUE TO HAVE SEX WITH THE STEADY OFFICERS THEY CAN GABRANTEE THAT I GET LET OUTSIDE MY CELL DAILY, THERE IS TWO INMATES WHO STAY INSIDE THIER CELL 23/HOURS OUT THE DAY, BECAUSE THEY REFUSED TO FOLLOW THE PROGRAM, I FEEL SORRY FOR THEM, THIER NAMES ARE CHRISTOPHER CANOE, AND THE NEXT ONE IS TREVOR FORREST, CANO IS IN 3 CELL AND FORREST IS IN 12 CELL, IM IN 1 CELL, AND THE OTHER IS ALEXANDER WILLIAMS HE'S IN 11 CELL, HE TOLD ME ABOUT THE PROGRAM BECAUSE HE'S BEEN DEALING WITH IT FOR OVER 2 YEARS ALREADY.. FOR THE PAST 3 MONTHS CAPTAIN JONES HAS BEEN COMING TO HOUSING AREA 2/A, JUST TO TRY TO GET ME TO DROP THE LAWSUIT SO I CAN GET MY VISITS BACK, AND I KEEP TELLING HER THAT I WON'T DROP THE LAWSUIT, AND SHE KEEP SAYING OVER AND OVER TO ME THAT SHE WILL MAKE SURE I WILL NEVER GET ANOTHER VISIT AS LONG AS I STAY HERE. C.O. KENOL, SHE TOLD ME TO DROP MY LAWSUIT AND EVERYTHING WILL GET BETTER FOR ME RIGHT AWAY. AND SHE TOLD ME THAT I BETTER DO THE RIGHT THING IF I KNOW WHAT'S GOOD FOR ME. ON AGUST/6/2022 AT NIGHT 7 TO 8PM WARDEN RENEE WITH SECURITY OFFICER YOUNG THEY TOLD ME TO DROP THE LAWSUIT IF I KNOW WHAT'S BEST FOR ME, THE ELIMINATION OF YOUR VISITS IS NOTHING COMPARED TO WHAT I'M GOING TO DO NEXT, THEY TOLD ME THAT C.O. PIERCE WILL PLACE A METAL SHANK IN MY CELL, AND ON AGUST 6/2022 C.O. PIERCE WENT INTO MY CELL AND TOOK A SPRAY BOTTLE OUT AT THE SAME TIME PLACE A METAL SHANK INSIDE MY CELL, THIS HAPPEN WHEN I WAS AT THE CLINIC FOR 6 HOURS DUE TO ME PASSING OUT FRON THE HEAT INSIDE MY CELL., I WENT TO THE BELLEVUE HOSPITAL ON ON JULY/XX 30/ 2022 AND I GOT DISCHARGED ON AGUST/2/2022 I WAS THERE BECAUSE I PASSED OUT FROM THE HEAT INSIDE MY CELL AND OFFICER MASON

REFUSED TO CALL FOR A MEDICAL EMERGENCY BECAUSE I CALL THE PREA INVESTIGATORS ON HER TO REPORT THE SEXUAL ABUSE I'VE ENCOUNTER AT HER EXPENSE, SO I CAUGHT A HEAT STROKE, HER SEXUAL PROWNESS WAS BECOMING TOO MUCH FOR ME TOO HANDLE. THIS HAPPEN ON JULY/30/2022, I SATISFIED THESE OFFICERS FOR OVER TEN MONTHS NOW JUST ~~IT~~ TO GET OUT MY CELL, AND THE DRUGS AND CIGARETTES, I WAS SCARED TO LOSE MY VISITS, AND I WAS SCARED THAT I CAN'T GO SEE MEDICAL FOR MY TWICE-A-DAY MEDICATIONS, AND I WAS SCARED THE HEAT MIGHT KILL ME INSIDE MY CELL SINCE I WAS A HEAT SENSITIVE INMATE, SO THESE OFFICERS MADE ME FEEL LIKE MY LIFE ON THE LINE,

59. C.O. LEECH AND C.O. WALKER TOLD ME DIRECTLY THAT THEY WILL NOT BRING ME TO THE LAW LIBRARY TO SPEAK WITH A LEGAL COORDINATOR, UNLESS I DROP THE LAWSUIT AGAINST THERE CAPTAIN CARTER AND WARDEN RENEE, AND C.O. LEECH TOLD ME THIS IN THE MONTHG OF JUNE/2022 AND JULY/2022 AND AGUST/2022 AND ~~XXHE~~ SHE SAID I WILL NOT BE BROUGHT TO THE LAW LIBRARY TO USE THE KIOSK WHICH HAVE THE LEXIS NEXIS ON IT.

60. C.O. WAL;KER TOLD ME IN THE MONTH OF JUNE/2022 AND JULY/2022 AND AGUST/2022 THAT I WILL NOT BE BROUGHT TO THE LAW LIBRARY UNLESS I DROP THE LAWSUITS I HAVE AGAINST HER WARDEN RENEE AND HER CAPTAIN CARTER. AND I WILL NEVER USE THE LEXIS NEXIS, SHE SAID SHE WANTS ME TO STAY IN JAIL FOR THE REST OF MY LIFE.

61. CAPTAIN JONES TOLD ME THAT SHE MADE SURE , HER AND C.O. PIERCE THAT I WON'T BE ABLE TO CALL THE 311 COMPLAINT LINE LONG AS I STAY IN JAIL, THEY ALSO TOLD ME THAT I WILL NEVER BE ABLE TO DIAL THE SEXUAL ABUSE HOTLINE FOR MEN IN PRISON ( 718-204-0378 ) THIS WAS TOLD TO ME IN JANUARY/2022 AND I WAS ALSO TOLD I WILL NEVER BE ABLE TO CALL THE 614# TO ARRANGE F OR A MEDICAL EXAM, LONG AS I'M GOING AGAINST THE PROGRAM AND AS LONG AS I GOT PENDING LAWSUITS AGAINST OFFICERS AND MEDICAL STAFF.

62. ON 7/23/2022 I WENT TO THE CLINIC INSIDE G.R.V.C AND TOLD DOCTOR BALAM THAT I MIGHT BE THE FIRST CASE OF MONKEY POX ON RIKERS ISLAND, AND I HAVE BIG BLISTERS THAT HURT ON MY FEET AND THAT I HAVE CONSTANT HEADACHES AND I

HAVE FEVER, HE TOLD ME NO I DON'T THEN I ASK HIM I WILL LIKE TO GET ~~TEXT~~ TESTED FOR MONKEY POX, HE SAID NO, AND THEN MADE A SEXUAL GESTURE TOWARDS ME. HE NEVER SENT ME TO GET TESTED AND HE NEVER GAVE ME NOTHING FOR THE PAIN I FELT FROM THE MONKEY POX VIRUS. ON 7/24/2022 I WENT BACK TO THE CLINIC TO COMPLAIN ABOUT THE MONKEY POX SYPTOMS I'M EXPERIENCING, AND HOW BAD THAT VIRUS IS MAKING ME FEEL, AND I TOLD NURSE BLOUNT THAT I WANTED TO GET TESTED SHE THEN TELLS ME THAT SHE WILL NOT TELL ANYBODY TO TEST ME BECAUSE, SHE DON'T BELIEVE I HAVE THE MONKEYPOX VIRUS, I TOLD HER THE BLISTERS HURT SO BAD, SHE SAYS SHE DON'T CARE, ON 7/25/2022 I ASK DOCTOR ASKARI TO TEST ME FOR MONKEY POX ON HOUSING UNIT 2/A AND HE TOLD ME HE'S NOT GOING TO TEST ME BECUASE HE HEARD I'M SUING GOOD CORRECTION OFFICERS, AND HE DON'T LIKE IT. I TOLD HIM MY BLISTERS HURT SO BAD, HE TOLD ME TO DEAL WITH IT AND HE'S NOT PRESCRIBING ME ANYTHING FOR THE PAIN, HE SAID HE DON'T CARE HOW LONG I SUFFER. I FELT NO CHOICE TO CALL MY LEGAL ~~EM~~ ADVISOR MR. HARLAN GREENBERG IN MY CRIMINAL CASE, HIS NUMBER IS 917-868-6765 AND I TOLD HIM THAT I'M IN PAIN FROM THE MONKEY POX OUTBREAK AND THAT RIKER'S ISLAND IS REFUSING TO TEST ME, I THEN WROTE MY MANHATTAN JUDGE IN MY CRIMINAL CASE, JUDGE ROSS, PART: TAP-A 100 CEWNTRE STREET, AND IN THE LETTER I TOLD THE JUDGE THAT I HAVE ALL THE SYBTOMS OF MONKEY POX, AND THAT RIKER'S ISLAND REFUSES TO TEST ME, SO WHEN I WENT TO COURT ON 7/28/22 I WAS NOT ALLOWED IN JUDGE ROSS COURTROOM BECAUSE HE ~~READ~~ MY LETTER, AND REFUSED TO LET ME IN THE COURTROOM WITHOUT GETTING TESTED. HE THEN WROTE A COURT-ORDER INSTRUCTING RIKER'S ISLAND TO GET ME TESTED FOR THE MONKEY POX VIRUS BEFORE MY NEXT COURT DATE WHICH IS 8/17/22 AS OF THIS DATE 8/10/22 I STILL HAVEN'T GOT TESTED AND IVE BEEN LIVING WITH SUCH PAIN SINCE I INFORMED THEM OF MY MONKEY POX CONDITION, I ASK FOR THE MEDICINE ATLEAST, AND WAS TOLD NO, I ALSO ASK FOR THE MONKEYPOX VACINE, AND I WAS TOLD KNOW, THEY TOLD ME THAT A RAPIST WIL BE THE LAST TO GET IT IN A RIKER'S ISLAND JAIL, THAT BROKE MY SPIRIT BECAUSE I'VE BEEN LIVING WITH THIS VIRUS FOR OVER A MONTH. MY JUDGE IN MY CRIMINAL MATTERS ISSUED A COURT-ORDER TO THE COMMISIONER OF RIKER'S ISLAND AND NO TEST



STILL HAVE BEEN MADE AVAILABLE TO ME, ON 7/25/2022 THE WORLD HEALTH ORGANIZATION DECLARED A GLOBAL EMERGENCY, I CALL 311 TO MAKE COMPLAINTS ABOUT THE PAIN I'M SUFFERING FROM THE MONKEYPOX VIRUS AND HERE IS THE 4 COMPLAINT NUMBERS THAT WAS ISSUED TO ME. (1) EC-00485561 , (2) EC-00485563 (3). EC-00486046, (4) EC-00486059 I TRYED TO GET HELP BY USING ANOTHER INMATE

PIN NUMBER JUST TO CALL 311 ,

63. IVE BEEN ON D.O.T <sup>F</sup>OR OVER 3 YEARS, D.O.T MEANS THAT I MUST TAKE MY MEDS INFRONT OF THE NURSE, AND THAT NURSE MUST MAKE SURE I SWALLOW THE PILLS.

BECAUSE I'VE BEEN KNOWN TO HOARD PILLS UNTIL I ACCUMILATE 20 OR 30 PIILS AT A TIME, THEN I WILL TAKE THEM ALL TO COMMIT SUICIDE. ON 7/25/22 AND 7/24/22 ON HOUSING UNIT 2/A IN G.R.V.C BETWEEN 6PM AND 8PM I WAS GIVEN THESE PILLS BY MEDICAL STAFF IN MY CELL ,WITHOUT THE NURSE CHECKING TO MAKE SURE I'M NOT SAVING THE MEDICATIONS, AS OF THIS DATE 8/8/2022 I HAVE OVER 50 PILLS IN MY POSSESSION BECAUSE THE LACK OF CARING BY DOC AND MEDICAL STAFF.

64. ASSISTANT DISTRICT ATTORNEY JAILE CAITLYN COERCE GINA RANDELL TO FURTHER HER REVENGE AGAINST ME BY BACKING UP THE LIES, AND ONCE GINA RANDELL TOLD THE TRUTH THAT SHE LIED ON ME, JAILE CAITLYN STILL PERSISTED TO PROSECUTE THE CASE AGAINST ME, KNOWING THAT THERE IS NOT ONE PIECE OF EVIDENCE THAT POINTS TO ME ,TO SAY I COMMITTED THIS CRIME, I HAVE A VIDEO TAPE CONFFESSION BY GINA RANDELL STATING SHE LIED ON ME, AND I HAVE RECORD <sup>J</sup>AIL CALLS I HAVE RECORDED JAIL CALLS WHERE MS. GINA RANDELL STATES THAT SHE WENT TO THE GRAND JURY AND TOLD A WHOLE LIE BECAUSE SHE WAS A WOMAN SCORN AND THAT NOBODY CAN'T HOLD HER ACCOUNTABLE ON HOW SHE FELT IN HER HEART. JAILE CAITLYN HEARD THESE SAME JAIL CALLS RECORDINGS AND DECIDED TO STIDL PROSECUTED THE CASE, THIS IS CALL MALICIOUS PROSECUTION AND ITS ILLEGAL TO PRESENT TO ANY COURT ~~XXXXXX~~ FALSE OR PERJURED TESTIMONY KNOWINGLY.

64. PROSECUTOR MS BREEN ALSO KNOWINGLY PRESENTED FALSE TESTIMONY TO A COURT, SHE HAS SEEN THE VIDEOTAPE THAT GINA RANDELL MADE TO COURT APPOINTED PRIVATE INVESTIGATOR, MR. GAZZOLA. AND SHE HAS HEARD THE RECORDED JAIL CALLS WHERE



SHE SAY SHE WENT TO THE GRAND JURY AND LIED, STILL PROSECUTOR MS BREEN STILL PRESENTED THIS FALSE GRAND JURY TESTIMONY TO JURORS AT MY TRIAL, THIS IS A MISCARRIAGE OF JUSTICE AND ITS MOST DEFINITLY MALICIOUS PROSECUTION.

65. BOTH PROSECUTORS HAVE CAUSE ME IRREPARABLE HARM, DURING THE COURSE OF THE 3 YEARS INCACERATION, AND THE BRUTALITY I ENCOUNTERED AT THE NOTORIOUS RIKER'S ISLAND, I COMMITTED OVER 5 SUICIDE ATTEMPS IN 3 YEARS BECAUSE I CAN'T DEAL WITH THE TORTURE. THESE PROSECUTORS COULD HAVE SET ME FREE IF ONLY THEY DID JUST A LITTLE INVESTIGATION INTO THE ASSAULT AND ROBBERY THAT GINA RANDELL CLAIM I DID, AND AFTER GINA RANDELL TOLD THE TRUTH THAT I DID'NT DO IT, THESE PROSECUTORS STILL WON'T LOCK GINA UP FOR PERJURY, AND ~~XXXXXXXX~~ THESE PROSECUTORS STILL WANT ME LOCK UP,

66. DETECTIVE JAMES QUILTY AND THE OTHER TWO DETECTIVES WHO WORKED WITH HIM, DID NOTHING TO INVESTIGATE THE CRIME WHICH HAD ME LOCKED UP FOR THREE YEARS. GINA RANDELL CAME TO SEE ME AT RIKERS ISLAND AND TOLD ME THAT DETECTIVE JAMES WQUILTY HELP HER FACILITATE HER LIES BY NOT INVESTIGATING THE CRIME SCENE, AND THAT HE WOULD SAY THAT THERE WAS NO CAMERAS ON THAT STREET CORNER, OF 150ST AND MACOMBS THAT WASX WORKING. HE DID NOT DO NOTHING BECAUSE HE TOLD GINA ITS VERY EASY TO KEEP A BLACK MAN LOCKED UP ~~WITHEHETHINE~~ WITH OUT ANY EVIDENCE, AND HE WILL HELP HER SEEK HER REVENGE, SHE TOLD HIM THAT SHE DID NOT KNOW WHO ATTACK HER, AND THAT SHE WAS DRINKING AND SMOKING MARIJUANA ALL NIGHT AT A FAMILY MEMBER PARTY, BEFORE SHE WAS ATTACK, HE TOLD HER THAT HE HAS CONNECTS INSIDE THE MANHATTAN DISTRICT ATTORNEY OFFICE. HE DID NOT EVEN USE ORDINARY DETECTIVE SKILLS IN HIS INVESTIGATION, OR A TOOL CALL THE BASIC DOZEN, A POLICY FROM THE N.Y.P.D PROCEDURES. ONLY BECAUSE RACE WAS AN ISSUE HE CHOSE TO DO FAULTY DETECTIVE WORK, WITH THE GAIN OF PUTTING AWAY ANOTHER BLACK MAN.

67. ON OR ABOUT JUNE 15, 2022 DEFENDANTS C.O. MASON, C.O. PIERCE ,C.O. LEEETH CAPTAIN JONES,C.O. RUSSELL, C.O. KENOL, C.O. WALKER THREATEN PLAINTIFF WITH BASELESS PUNITIVE ACTION ( INCLUDING HAVING HIS VISITS TAKEN AWAY FROM HIM),

AS WELL AS HAVING HIS PIN# CHANGED SO HE CAN'T CALL HIS LAWYER, AS WELL AS TAKEN HIS 311 CALLS OFF HIS PHONE LIST SO HE CAN'T MAKE NO 311 COMPLAINTS, AND NOTIFYING THE JUDGE IN HIS CRIMINAL CASE, AS WELL TAKE AWAY MY ABILITY TO CALL THE P.R.E.A (PRISON RAPE ELIMINATION ACT )HOTLINE TO REPORT THE SEXUAL ABUSE, AS WELL TAKE AWAY MY ABILITY TO CALL 614 MEDICAL HOTLINE INCASE I GET SICK OR HAVE MENTAL HEALTH ISSUES. THE CITY FAILED TO REMOVE PLAINTIFF FROM CONTACT WITH THE DEFENDANTS, AND FAILED TO TAKE ANY ACTION TO PREVENT FURTHER SEXUAL ABUSE BY THESE DEFENDANTS.,

68. IN FURTHER RETALIATION AND RETRIBUTION TAKEN AGAINST PLAINTIFF AT THAT TIME, DEFENDANTS, HAS PLACE PLAINTIFF IN A CELL WHERE ITS 90%DEGREES INSIDE THE CELL. PLAINTIFF IS AN HEAT SENSITIVE INMATE, WHICH MEANS HE IS SUPPOSE TO BE PLACE IN HEAT SENSITIVE HOUSING, WHERE PLAINTIFF IS HOUSED AT UNIT2/A IS THE ONLY HOUSING UNIT IN G.R.V.C TO NOT HAVE AIR CONDITIONER, THERE ARE 17 HOUSING UNITS WHERE PLAINTIFF CAN BE PLACED, BUT AS LONG AS PLAINTIFF HAS A LAWSUIT AGAINST THE WARDEN HE WILL BE IN A CELL /23 HOURS WITH NOA/C AIR CONDITIONER, AND HE WILL NOT BE TAKEN TO THE YARD FOR FRESH AIR. THIS WAS IMPLEMENTED BY DEFENDANTS WHO WORK FOR CORRECTION WHO OVERSAW PLAINTIFF BODY FOR THE SUMMER 2022, DURING THE NUMEROUS HEAT WAVES BY BEING IN THE CELL PLAINTIFF HAVE SUFFERED NUMEROUS ASTHMA ATTACKS DUE TO THE EXCESSIVE HEAT, NUMEROUS FAINTING SPELLS, AND EVEN BEEN HOSPITALIZED FROM A HEAT STROKE.

59. BOARD OF CORRECTION ANNOUNCEMENT PROPOSAL TO END SOLITARY CONFINEMENT AND REPLACE WITH NEW DISCIPLINARY MODEL, ON MARCH,24,2021 WAS ENACTED AND REPLACE SOLITARY CONFINEMENT WITH A MORE HUMANE MODEL, THE RISK MANAGEMENT ACCOUNTABILTY SYSTEM (RMAS) YOU CAN CONTACT THE BOARD OF CORRECTIONS AT (212) 669-7900, THE PROPOSED RULE IS ALSO AVAILABLE ON THE BOARDS WEBSITE- WWW.NYC.GOV/BOC. I HAVE BEEN PLACE IN 23/HOUR LOCKDOWN BY DOC AND THERE IS A POLICY FROM THE BOARD OF CORRECTIONS THAT STATES SOLITAREY CONFINEMENT IS NOT IN USE NO MORE, THE DEPARTMENT OF CORRECTION IS USING A COURT-ORDER AS PUNITIVE, JUST BECAUSE OF MY PENDING LAWSUITS AGAINST DOC OFFICERS AND

STAFF. UPON INFORMATION AND BELIEF, A PREA-MANDATED INVESTIGATION WAS INITIATED. NOTWITHSTANDING, THE SEXUAL ABUSES CONTINUED. IT IS CLEAR THAT THESE MATTERS HAVE NOT BEEN FAITHFULLY INVESTIGATED OR RESOLVED. I ASK THAT THESE MATTERS BE IMMEDIATELY LOOKED INTO AND THAT I BE UPDATED FORTHWITH..

70. ~~DESPITE PRIOR COMPLAINTS AND GRIEVANCES, INCLUDING SUBSTANTIATED~~ ALLEGATIONS, OF CRIMINAL MISCONDUCT BEING COMMITTED AGAINST PRISONERS BY CORRECTION OFFICERS IN HOUSING UNITS OF DOC FACILITIES, INCLUDING BUT NOT LIMITED TO SEXUAL ABUSE AND RAPE, BEATINGS, THREATS, AND COERCING OF STATEMENTS AND ACTS, AS WELL AS OTHER UNLAWFUL CONDUCT, DEFENDANT CITY HAS FAILED TO INCREASE THE DEGREE OF SUPERVISION THEREAT AND/OR TAKE ANY OTHER REASONABLE MEASURES TO PROVIDE GREATER SECURITY WITHIN THE CLINIC AREAS.

71. DEFENDANTS CITY'S INADEQUATE SUPERVISION AND STAFFING OF THE AFORESAID FACILITY HOUSING UNITS MADE IT EASY FOR DEFENDANTS, C.O. MASON, C.O. BERNIER, C.O. PIERCE, C.O. KENOL, C.O. ~~RXXXXXXX~~ RUSSEL, C.O. WALKER, C.O. LEECH, CAPTAIN JONES TO FORCIBLY TOUCH, HARASS, SEXUALLY HARASS, ASSAULT, VERBALLY ABUSE THE PLAINTIFF AS WHATEVER STAFF WERE PRESENT WERE COMPLICIT IN AND/OR DELIBERATELY INDIFFERENT TO SAID DEFENDANTS VICTIMIZATION OF PLAINTIFF IN EACH INSTANCE.

72. DOC STAFF AND OFFICER, INCLUDING BUT NOT LIMITED TO DEFENDANTS C.O. MASON ~~C.O.~~ BERNIER, C.O. PIERCE, C.O. WALKER, C.O. LEECH, C.O. RUSSEL, C.O. CAPTAIN JONES. WERE ABUSING THE PLAINTIFF AT THE SAID ABUSES OCCURRED. PLAINTIFF CONTEMPORANEOUSLY REPORTED DEFENDANTS, C.O. MASON, C.O. BERNIER, C.O. PIERCE C.O. WALKER, C.O. LEECH, C.O. RUSSEL, C.O. KENOL, C.O. CAPTAIN JONES ABUSES TO DOC OFFICIALS, HOWEVER DOC OFFICIALS FAILED TO REMOVE DEFENDANTS FROM CONTACT WITH PLAINTIFF.

73. DEFENDANTS C.O. MASON, C.O. PIERCE, CAPTAIN JONES, C.O. LEECH, C.O. WALKER C.O. BERNIER, C.O. KENOL, C.O. RUSSEL WAS NEVER REMOVED FROM DUTY PENDING ~~AN~~ INVESTIGATION, AND A FAITHFUL INVESTIGATION WAS NEVER CONDUCTED INTO PLAINTIFFS CLAIMS OF SEXUAL ASSAULT, ABUSE, VICTIMIZATION, THE ABUSES ALLEGED WERE ALLOWED

TO CONTINUE UNABATED, AS A RESULT THEREOF, DEFENDANTS WAS ABLE TO VICTIMIZED THE PLAINTIFF WITH IMPUNITY WHILE THIER CO-WORKERS, SUPERVISORS AND STAFF CHOSED TO PROTECT THEM FROM DETECTION RATHER THAN PLAINTIFF FROM FURTHER ABUSE. WITH THE ENACTMENT OF THE PRISON RAPE ELIMINATION ACT OF 2003, THE NATIONAL PRISON RAPE ELIMINATION COMMISSION WAS CREATED AND CHARGED WITH DRAFTING STANDARDS FOR ELIMINATING PRISON RAPE. THOSE STANDARDS WERE PUBLISHED IN JUNE 2009 AND GIVEN TO THE U.S. DEPARTMENT OF JUSTICE FOR REVIEW AND PASSAGE AS A FINAL RULE. THE DEPARTMENT OF JUSTICE PUBLISHED THE FINAL PREA STANDARDS IN THE FEDERAL REGISTER ON JUNE 20, 2012, AND THEY BECAME EFFECTIVE AGUST 20, 2012. STANDARDS G.R.V.C WERE NOT FULLY COMPLIANT WITH PREA STANDARDS DURING RELEVANT TIME PERIODS ALLEGED HEREIN. DUE TO DEFENDANTS CITY'S LONG-STANDING FAILURE TO IMPLEMENT MANDATED PREA REFORMS AND STANDARDS, INCLUDING BUT NOT LIMITED TO THE POLICIES, TRAINING, INVESTIGATIONS, REPORTING AND LEADERSHIP FROM THE TOP DOWN, DEFENDANT CITY AND ITS SUPERVISORY PERSONELL WERE DELIBERATELY INDIFFERENT TO THE SEXUAL THREATS, ABUSE , AND TO THE SEXUAL SAFETY FACED BY THE IR INMATE POPULATION, CORRECTIONS STAFF IN PARTICULAR AND WERE THE MOVING FORCE BEHIND THE SEXUAL ASSAULTS SUFFERED BY PLAINTIFF.

74. HEREIS THE COMPLAINT #'S FROM ALL MY 311 CALLS SINCE I'VE BEEN IN HOUSING UNIT 2/A IN THE G.R.V.C (1) EC-00484820 (2) EC-00490236 (3) EC-00490241 (4) ~~EC~~ EC-00490247 (5) EC-00490269, THE RELIGIOUS, LANDUSE, AND ~~XX~~ INSTITUTIONLIZED PERSON ACT 2000, NOBODY HAS TAKEN ME TO JUMAH SERVICES AND NO IMAN HAS COME TO HOUSING UNIT 2/A ON THE REGULAR BASIS, MY SINCERE HELD BELIEFS MAKES ME WANT TO COMMIT SUICIDE, BECAUSE I CAN'T PROPERLY PRACTICE MY FAITH.

75. TODAY IS AGUST 9, 2022 AND ITS 10AM AND C.O. PIERCE AND C.O. MASON ARE BOTH WORKING THE HOUSING UNIT, I CALL PREA ON BOTH C.O. MASON AND C.O. PIERCE AND REPORTED THE ABUSE I ENCOUNTER FROM THEM OVER THE PAST 10 MONTHS, AND YET AND STILL THEY ARE HERE TODAY, AND I WAS ASK TO GO GET NAKED AND TAKE A SHOWER

AND GET NAKED THEN I WILL BE ABLE TO COME OUTSIDE MY CELL JUST LIKE THE INMATE IN 11 CELL, 12 CELL NEVER COMES OUT BECAUSE HE REFUSES TO COMPLY WITH THIER SEX GAMES, ITS OVER 100 DEGREES IN NEW YORK CITY TODAY, AND ITS ONLY 3 INMATES THAT ARE HOUSED IN UNIT 2/A AND WE ARE ALL HEAT SENSITIVE INMATES, ~~THIS HOUSING UNIT IS NOT A HEAT SENSITIVE HOUSING UNIT, THEY ARE~~ USING THIS HOUSING UNIT AS BEING PUNITIVE, BECAUSE THEY DON'T LIKE WHAT US 3 INMATES ARE CHARGED WITH, ONE IS CHARGED WITH MURDER, AND ANOTHER IS CHARGE WITH BEING A ~~XXXXX~~ TERROIST, AND I'M CHARGED WITH RAPE. I WAS TOLD THAT THIS HOUSING UNIT 2/A IS FOR BADBOYS, BY C.O. PIERCE, C.O. BERNIER, C.O. RUSSEL E.O. MASON, C.O. KENOL, C.O. JONES CAPTAIN, NURSE BLOUNT, DOCTOR ASKARI, DOCTOR KALAM, WE ARE THE BEST HOUSE BECAUSE THEY KNOW WE HAVE SEX IN EXCHANGED TO GET A BREAK OUT OF THE CELL FOR 23/HOURS.

76. AS A RESULT OF THE FOREGOING, PLAINTIFF SUFFERED AND CONTINUES TO SUFFER SEVERE AND PERMANENT PHYSICAL, PSYCHOLOGICAL AND EMOTIONAL INJURIES, PAIN AND SUFFERING.

77. AS SET FORTH ABOVE, DEFENDANTS, C.O. MASON, C.O. RUSSEL, C.O. BERNIER, C.O. PIERCE, CAPTAIN JONES, C.O. KENOL, C.O. WALKER, C.O. LEECH, DETECTIVE JAMES QUILTY, DETECTIVE JOHN DOE#1, DETECTIVE JOHN DOE #2, PROSECUTOR MS. BREEN, PROSECUTOR JAILE CAITLYN, DID VIOLATE AND THE CITY OF NEW YORK DID VIOLATE PLAINTIFF'S CONSTITUTIONAL RIGHTS AND WAS DELIBERATELY INDIFFERENT TO AND/OR CONSCIOUSLY DISREGARDED AN EXCESSIVE RISK TO PLAINTIFF'S HEALTH AND SAFETY.

78. GINA ~~XXX~~ RANDELL DID VIOLATE PLAINTIFF'S CONSTITUTIONAL RIGHTS, BY PERJURING HERSELF TO THE GRAND JURY, WHICH KEPT THE PLAINTIFF IN JAIL FOR MORE THAN 3YRS. AND CONSCIOUSLY DISREGARDED AN EXCESSIVE RISK TO PLAINTIFF'S HEALTH AND SAFETY.

#### FIRST CLAIM FOR RELIEF:

CLAIMS AGAINST DEFENDANTS GINA RANDELL, C.O. MASON, C.O. PIERCE, C.O. KENOL, PROSECUTOR MS. BREEN, PROSECUTOR JAILE CAITLYN, C.O. RUSSEL, C.O. WA



C.O. LEECH, CAPTAIN JONES, DETECTIVE JAMES QUILTY, DETECTIVE JOHN DOE#1  
DETECTIVE JOHN DOE #2, DOCTOR KALAM, DOCTOR ASKARI, NURSE BLOUNT, AND THE  
~~XXXX~~ CITY OF NEW YORK, CITY HEALTH AND HOSPITALS.

PURSUANT TO 42 U.S.C. & 1983

PLAINTIFF REPEATS, RETTERATES AND REALLEGES EACH AND EVERY ALLEGATION CONTAINED  
IN THE PRECEDING PARAGRAPHS OF THIS COMPLAINT WITH THE SAME FORCE AND EFFECT  
AS IF SAME WERE FULLY SET FORTH HEREIN.

~~79. AT ALL RELEVANT TIMES, DEFENDANT C.O. MASON, C.O. KENOL, C.O. BERNIER,~~  
C.O. PIERCE, C.O. RUSSEL, C.O. WALKER, C.O. LEECH, CAPTAIN JONES, DETECTIVE  
JAMES QUILTY, DETECTIVE JOHN DOE #1, DETECTIVE JOHN DOE #2, PROSECUTOR  
MS. BREEN, PROSECUTOR JAILE CAITLYN, DOCTOR KALAM, DOCTOR ASKARI, NURSE  
BLOUNT WAS AND AND IS EMPLOYEES OF DEFENDANT CITY, AND WAS ACTING UNDER  
COLOR OF STATE LAW.

~~XX~~80. AS SET FORTH ABOVE, DEFENDANTS DOCTOR ASKARI, AND DOCTOR KALAM, AND  
NURSE BLOUNT, DID NOT TREAT ME FOR THE MONKEYPOX, AND DID NOT GET ME TESTED,  
AND THEY DID NOT TELL THE DOC STAFF THAT I NEED HEAT SENSITIVE HOUSING, WHEN  
THEY KNEW I WAS A HEAT SENSITIVE INMATE, EVEN THOUGH THEY KNEW I HAD NUMEROUS  
ASTMA ATTACKS DUE TO THE EXCESSIVE HEAT WAVES OF 2022 SUMMER, I <sup>STILL</sup> SUFFER  
TODAY 8/9/2022 TIME 2PM, OFFICER TABI CAME TO HOUSING UNIT 2/A AND DID A  
TEMPERATURE CHECK, OF ME CELL #1 AND THE TEMPERATURE ~~IS~~ OVER 90 DEGREES  
I SHOULD NOT BE IN THAT CELL KNOWING MY HEALTH CONDITIONS AND ITS KILLING  
ME PHYSICALLY AND MENTALLY.

81. SECOND CLAIM~~X~~ FOR RELIEF: CLAIMS AGAINST  
DEFENDANTS C.O. MASON,

C.O. PIERCE, C.O. KENOL, C.O. WALKER, C.O. LEECH, CAPTAIN JONES, C.O. BERNIER  
C.O. RUSSEL, DOCTOR ASKARI, DOCTOR KALAM, NURSE BLOUNT, DETECTIVE JAMES QUILTY,  
DETECTIVE JOHN DOE #1, DETECTIVE JOHN DOE #2, PROSECUTOR MS!! BREEN, PROSECUTOR  
JAILE CAITLYN, CITY OF NEW YORK, AT ALL RELEVANT TIMES DEFENDANTS WAS EMPLOYEES



OF DEFENDANT CITY, AND AT ALL RELEVANT TIMES DEFENDANTS WAS ACTING UNDER COLOR OF STATE LAW, AND AT ALL RELEVANT TIMES PROSECUTORS MS. BREEN AND PROSECUTOR WAS OVERSEEING THE INVESTIGATION OF N.Y.P.D DETECTIVE JAMES QUILTY, AND HIS TO DETECTIVES UNDERLINGS,

82. AT ALL RELEVANT TIMES PROSECUTORS GAVE FALSE EVIDENCE KNOWINGLY TO THE COURTS,

83. AT ALL RELEVANT TIMES DETECTIVE JAMES QUILTY KNOWING FACILITATED THE LIE OF GINA RANDELL AND COERCE GINA RANDELL TO GIVE FALSE TESTIMONY TO THE GRAND JURY.

84. ~~XXX~~ ON 8/9/22 AT TIME 5PM TO 7PM ON HOUSING UNIT 2/A IN G.R.V.C OFFICER MCNIEL SEARCH MY CELL AND TOLD ME THAT I BETTER DROP MY LAWSUIT AGAINST THE WARDEN RENEE AND CAPTAIN CARTER, OR THEY WILL BE OTHER THINGS HE CAN DO LIKE TAKE AWAY MY FAMILY VISITS, I WILL LIKE TO ASK THIS COURT TO PRESERVE THE GENTEC VIDEO FOOTAGE FROM THIS DAY, ALSO ANOTHER INMATE IN 11 CELL THAT GOES BY THE NAMED ALEXANDER WILLIAMS, WAS ALSO TOLD TO DROP HIS LAWSUITS AGAINST DOC STAFF, THE INMATE IN 12 CELL WAS NOT SEARCH BECAUSE HE DON'T HAVE ANY PENDING LAWSUITS AGAINST THE DEPARTMENT OF CORRECTIONS. THERE WAS 5 MEMBERS OF THE SECURITY TEAM THAT SEARCH MY CELL TODAY WITHOUT CAUSE. CONSEQUENTLY, REGARDLESS OF THE ALLEGED TRANSPIRE EVENTS, THE NOTION THAT THE ALLEGED AGUST 9/2022 AUGUST/9/2022 INCIDENT COULD HAVE STEMMED FROM OR BE RELATED TO THE SOLE REMAINING CLAIM, RETAILIATION, WOULD APPEAR TO BE CONJECTURE AT BEST.

85. ~~XXXX~~ AS SET FORTH ABOVE, DEFENDANTS C.O. MASON, C.O. PIERCE, C.O. BERNIER C.O. WALKER, C.O. LEECH, CAPTAIN JONES, C.O. RUSSEL DID RETALIATE AGAINST PLAINTIFF AND REFUSE TO GIVE HIM VISITS, DID REFUSE TO GET ME TO HEAT SENSITIVE HOUSING AS MANDATED FOR AN HEAT SENSITIVE INMATE. THEY DID REFUSE TO GET PLAINTIFF 311 ACCESS ON HIS PHONE LINE SO HE CAN MAKE COMPLAINTS IF NEED BE. THEY DID REFUSED TO GET 614# PUT ON MY CALL LIST SO I CAN CALL MEDICAL IF I WAS SICK OR NEED MENTAL HEALTH AND I WANTED TO REMAIN CONFIDENTIAL.

THEY DID REFUSED TO PUT THE PREA HOTLINE ON MY PHONE LIST, JUST IN CASE I WANTED TO REPORT THE SEXUAL ABUSE IN PRIVATE AND NOT FEAR RETAILIATION.

86. AS A RESULT OF THE FOREGOING, PLAINTIFF SUFFERED AND CONTINUES TO SUFFER SEVERE AND PERMANENT PHYSICAL, PSYCHOLOGICAL AND EMOTIONAL INJURIES, PAIN AND SUFFERING.

87. AT ALL TIMES RELEVANT PROSECUTORS MS. BREEN SUBMITTED FALSE TESTIMONY TO THE COURT KNOWINGLY, AFTER SEEING VIDEO OF COMPLAINING WITNESS GINA RANDELL STATING SHE LIED ON ME BECAUSE SHE WAS A WOMAN SCORN.

88. AT ALL TIMES RELEVANT PROSECUTORS MS. BREEN SUBMITTED FALSE TESTIMONY TO THE COURTS KNOWINGLY, AFTER SHE HEARD RECORDED JAIL CALLS FROM THE COMPLAINING WITNESS GINA RANDELL SAYING THAT SHE WENT TO THE GRAND JURY AND GAVE PERJURED TESTIMONY BECAUSE SHE WAS A WOMAN SCORN AND CAN'T NOBODY HOLD HER ACCOUNTABLE FOR WHAT SHE FELT IN HER HEART.

89. AT ALL TIMES RELEVANT PROSECUTORS MS. BREEN KNEW THAT GINA RANDELL WAS A FUGITIVE RUNNING FROM GEORGIA PROBATION DEPARTMENT AND REFUSE TO DIVULGE GINA WHEREABOUTS TO THE PROPER GEORGIA AUTHORITIES.

90. AT ALL TIMES RELEVANT PROSECUTORS MS. BREEN DID NOT INDICT GINA RANDELL ON PERJURY CHARGES AFTER SHE SAW THE VIDEO OF GINA RANDELL ADMITTING SHE TOLD A LIE ON ME TO GET ME ARRESTED, MS . BREEN FAIL TO TURN OVER THE DISCOVERY TO THE DEFENSE AFTER SO MANY REQUEST, DELAYING ME PLAINTIFF TO BE IN JAIL THAT MUCH LONGER WITHOUT NO BAIL. I ASK MS. BREEN TO TURN OVER THE TWO OTHER DETECTIVES NAMES AND DISCIPLINARY RECORDS WHO WORK WITH JAMES QUILTY AT THE 32ND PRECINT, AND SHE REFUSED.

91. AT ALL TIMES RELEVANT PROSECUTOR JAILE CAITLYN BOTCHED THE INVESTIGATION INTENTIONALLY TO GET AN INDICTMENT FROM THE GRAND JURY BY NOT PULLING VIDEO FOOTAGE XFROM THE CRIME SCENE, BY NOT TRACKING THE VICTIM PHONE, TO SHOW THAT THE VI<sup>CTIM</sup> WAS LYING, SHE DID TRACK OR CHECKED HER TEXT MESSAGES TO SEE, THE LAST PERSON SHE TEXT FROM THE NI<sup>GHT</sup> IN QUESTION.

SHE DID FACILTATE THE LIE FROM THE VICTIM GINA RANDELL, AND ASSURE THE VICTIM THAT THERE WILL BE NO PUNISHMENT FOR HER IF SHE TOLD A LIE TO THE GRAND JURY, AND THAT SHE WILL NOT REPORT GINA RANDELL WHEREABOUTS TO THE GEORGIA PROBATION DEPARTMENT.

92. AT ALL TIMES RELEVANT DEFENDANT JAILE CAITLYN ABUSE HER POSITION TO COVER UP HER WRONGDOING WHILE ACTING AS A PUBLIC SERVANT. JAILE CAITLYN REFUSED TO CANVASS THE 3 APARTMENT BUILDINGS ON 150STREET AND MACOMBS WHERE THERE WERE HUNDREDS OF POTENTIAL WITNESSES TO THE OCT/6/2018 ASSAULT OF GINA RANDELL. THIS TACTIC WAS TO ENSURE THE WRONG MAN GET PIN FOR THE FAKE CHARGES.

93. AT ALL TIMES RELEVANT DEFENDANT JAILE CAITLYN REFUSE TO ARREST GINA RANDELL AFTER SHE SAW VIDEO FOOTAGE OF GINA RANDELL ADMITTING THAT SHE LIED ON THE PLAINTIFF, AND AFTER SHE HEARD NUMEROUS RECORDED JAIL CALLS WHERE GINA RANDELL SAID SHE WENT TO THE GRAND JURY AND PERJURED HERSELF BECAUSE SHE WAS A WOMAN SCORN, AND CAN'T NOBODY HOLD HER ACCOUNTABLE XFROM WHAT SHE FELT IN HER HEART AT THAT MOMENT WHEN SHE GAVE TESTIMONY, AND YET AND STILL JAILE CAITLYN ~~REKHXEXTX~~ PRESENT PEJURED TESTIMONY TO THE COBRTS.

94. AT ALL RELEVANT TIMES DEFENDANT JAILE CAITLYN DID NOT ARREST GINA RANDELL OR HAD GINA RANDELL ARRESTED FOR GIVING FALSE TESTIMONY AT THE GRAND JURY, NOR DID JAILE CAITLYN HAD GINA ARRESTED FOR MAKING A FALSE POLICE REPORT. JAILE CAITLYN DID NOT LOOK FOR ANY ADDITIONAL WITNESSES TO THIS CRIME THAT SUPPOSEDLY HAPPEN ON THE CORNER OF 150STREET AND MACOMBS AT 3:30 AM, JAILE CAITLYN DID NOT TRACK THE CAB DRIVER WHO TOOK GINA RANDELL TO THE HOSPITAL AFTER HER ALLEDGE ATTACK ON THE NIGHT OF OCTOBER/6/2018. IF JAILE CAITLYN JUST USE ORDINARY INVESTIGATION SKILLS I WOULD NOT HAVE SPENT THE LAST 3 YEARS OF MY LIFE BEHIND BARS.

95 AS A RESULT OF THE FOREGOING, PLAINTIFF SUFFERED AND CONTINUES TO SUFFER SEVERE AND PERMANENT, PHYSICAL, PSYCHOLOGICAL AND EMOTIONAL INJURIES, PAIN AND SUFFERING.

96. AT ALL TIMES MENTION AND RELEVANT HEREIN, DEFENDANT CITY KEPT ME IN SOLITARY CONFINEMENT FOR OVER 3 YEARS, WITHOUT PHONE CALLS, 23/HOUR IS BANNED FROM NEW YORK CITY AS OF EARLY 2022 , 23/HOURS IN A CELL VIOLATES PLAINTIFF CONSTITUTIONAL RIGHTS, PLAINTIFF IS CERTIFIED HAS .P.T.S.D MENTAL ISSUES FOR WELL OVER 20 YRS, AND PLAINTIFF HAS ATTEMPTED SUICIDE OVER 5 TIMES SINCE HIS MARCH 1/2022 INCARCERATION.

97. AT ALL TIMES RELEVANT DEFENDANT CITY HAS NOT CHOSED TO REMOVE PLAINTIFF FROM SOLITARY CONFINEMENT, AS OF THIS DATE AUGUST/10/ 2022 PLAINTIFF HAVE SUUFFERED THROUGH MANY HALLUCINATIONS, ANXIETY, DEEP DEPRESSION, AND HAS EVEN PASS OUT IN CELL, DEFENDANT CITY, DID VIOLATE PLAINTIFF'S CONSTITUTIONAL RIGHTS AND WAS DELIBERATELY INDIFFRENT TO AND/OR CONSCIOUSLY DISREGARDED THE EXCESSIVE RISK TO PLAINTIFF'S HEALTH, MENTAL HEALTH AND SAFETY.

98. AT ALL RELEVANT TIMES, DEFENDANTS MS . BREEN AND JAILE CAITLYN WAS ACTING UNDER COLOR OF STATE LAW.

99. AT ALL RELEVANT TIMES PROSECUTORS DEFENDANTS JAILE CAITLYN DID STOP ME FROM DIALING 311 COMPLAINT HOT LINE, BY NOT ADDING THE 311 TO MY ALLOWED CALLING LIST. , JAILE CAITLYN DID STOP ME FROM CALLING THE PREA HOTLINE# 718-204-0378 TO STOP AND KEPT THE ABUSE UP OF THESE CORRECTION OFFICERS. THE PREA HOTLINE IS AVAILABLE TO EVERY INMATE IN CUSTODY OF THE DEPARTMENT OF CORRECTIONS, EXCEPT ME, I WAS SEXUALLY ABUSE AND HARRASSED ON NUMEROUS OCCASIONS, AND I COULDN'T CALL THE PREA HOTLINE TO REPORTX THE ABUSES. I SUFFERED SO MUCH, I WILL NEVER BE THE SAME.

100. AT ALL TIMES RELEVANT DEFENDANTS PROSECUTOR JAILE CAITLYN DID STOP ME FROM CALLING 614# TO ACCESS MEDICAL SERVICES INSIDE THE JAIL BY NOT ADDING THAT NUMBER TO MY ALLOWED CALLING LIST, I SUFFERED BY NOT BEING ABLE TO SEEK MENTAL HEALTH AND OTHER CRITICAL MEDICAL SERVICES.

101. AT ALL TIMES RELEVANT DEFENDANTS PROSECUTOR JAILE CAITLYN KEPT ME INSIDE SOLITARY CONFINEMENT AFTER SHE KNEW THAT NEW YORK CITY HAS BANNED THIS PUNITIVE PUNISHMENT, 23/HOURS LOCK IN A CELL IS CRUEL AND UNUSUAL PUNISHMENT.

JAILE CAITLYN DID NOT PETITION THE JUDGE TO LIFT THE COURT-ORDER LOCK-DOWN RESTRICTIONS ONCE SHE KNEW THAT SOLITARY CONFINEMENT IS OUTLAWED IN NEW YORK CITY.

102. AT ALL RELEVANT TIMES DEFENDANTS PROSECUTORS MS. BREEN DID STOP ME FROM DIALING 311 TO MAKE A COMPLAINT BY NOT ADDING IT TO MY ALLOWED CALLING LIST.

MS. BREEN DID STOP ME FROM DIALING 614# TO ACCESS MEDICAL SERVICES INSIDE THE JAIL AND TO GAIN ACCESS TO MENTAL HEALTH SERVICES. MS, BREEN DID STOP ME FROM DIALING THE NATIONAL PREA HOTLINE (718) 204-0378, AND I HAVE BEEN SEXUALLY ABUSED AND HARRASSED BY CORRECTION OFFICIERS FOR THE ENTIRE 3 YRS OF MY INCACERATION,

103. AT ALL RELEVANT TIMES DEFENDANTS MS. BREEN DID NOT PETITION THE JUDGE TO TAKE ME OUT OF SOLITARY CONFINEMENT EVEN THOUGH THIS PRACTICE HAS BEEN OUTLAWED IN NEW YORK CITY, 23/HOURS IN A CELL CAUSING MENTAL BREAKDOWNS, ESPECIALLY IF YOU HAVE MENTAL ISSUES SUCH AS MYSELF, I HAVE P.T.S.D.

104. AS A RESULT OF THE FORE GOING TWO PROSECUTORS MS. BREEN AND JAILE CAITLYN PLAINTIFF SUFFERED AND CONTINUES TO SUFFER SEVERE AND PERMANENT PHYSICAL, PSYCHOLOGICAL AND EMOTIONAL INJURIES, PAIN AND SUFFERING.

105. AS OF TODAY AUGUST/10/2022 AT 9AM C.O. PIERCE TOLD ME THAT HE LIKES WHEN I WALK AROUND BARECHESTED AND THAT C.O. MASON WANTS TO SEE ME WALK AROUND BARECHESTED, AND IF I DON'T COMPLY I WILL HAVE TO BE LIKE THE INMATE FORREST WHO IS IN 12# CELL AND STAY IN MY CELL 23/HOURS OUT THE DAY, I'M FEEL SO VIOLATED BY THESE OFFICERS THEY KNOW I CAN'T BREATH INSIDE THE HOT CELL, SO I'M FORCE TO OBLIGED THEM, I'VE BEEN REPORTED THESE TWO OFFICERS TO PREA INVESTIGATORS YET AND STILL THEY ARE ON HOUSING UNIT 2/A TO ANNOY AND HARRAS ME, I WAS TOLD BY C.O. PIERCE TODAY THAT HE WILL TRY TO TALK TO THE HIGHER UPS TO GET MY VISITING PRIVELAGES BACK, LONG AS I DO THE RIGHT THING, I SHOULD BE OK, AND HE WON'T LOCK ME IN MY CELL FOR 23/HOURS OUT THE DAY, I TOLD HIM THAT 23/HOURS IN A CELL IS BANNED IN NEW YORK CITY, HE TOLD ME THAT IF I DON'T WALK AROUND BARE CHESTED HE WILL MAKE SURE THAT I'M LOCK IN A CELL FOR 23 HOURS A DAY.

106. AS SET FORTH ABOVE, DEFENDANTS CITY, C.O. CAPTAIN JONES, C.O. BERNIER, C.O. WALKER, C.O. LEECH, C.O. KENOL, C.O. RUSSEL, C.O. PIERCE WERE EACH PERSONALLY AWARE THAT UNLAWFUL SEXUAL ACTIVITY WAS OCCURRING BETWEEN ALL THE ABOVE DEFENDANTS AND PLAINTIFF.

~~107. PURSUANT TO DOC DIRECTIVE, PREA STANDARDS, AND THE LAW, DEFENDANTS C.O. MASON, C.O. PIERCE, C.O. CAPTAIN JONES, C.O. KENOL, C.O. WALKER, C.O. LEECH, C.O. RUSSEL, C.O. BERNIER, NURSE MS. BLOUNT, DOCTOR ASKARI, DOCTOR KALAM WERE REQUIRED TO PROMPTLY REPORT THE SEXUAL ACTIVITY ALLEGED HEREIN BUT FAILED TO DO SO~~

108. PURSUANT TO DOC DIRECTIVE, PREA STANDARDS, AND THE LAW, DEFENDANTS CITY WERE REQUIRED TO PROMPTLY REMOVE PLAINTIFF FROM CONTACT WITH DEFENDANTS, C.O. MASON, C.O. PIERCE, C.O. KENOL, C.O. BERNIER, C.O. WALKER, C.O. LEECH, C.O. RUSSEL, C.O. CAPTAIN JONES, DOCTOR ASKARI, DOCTOR KALAM, NURSE BLOUNT, BUT FAILED TO DO SO.

109. AS OF THIS DATE 8/10/2022 I CALL THE DEPARTMENT OF INVESTIGATION HOTLINE# (212) 266-1900 AND SPOKE WITH CAPTAIN YOUNG, I MADE MY COMPLAINT TO HER ABOUT ME BEING RETALIATED AGAINST SINCE I MADE PREA COMPLAINTS ON A FEW OFFICERS HERE IN G.R.V.C, AND I TOLD CAPTAIN YOUNG THAT THE HIGHER-UPS IN DOC TOOK AWAY MY VISITING PRIVILEGES ALL BECAUSE I MADE A PREA COMPLAINT AGAINST OFFICERS CAPTAIN YOUNG TOLD ME SHE WILL LOOK INTO THIS MATTER AND WILL FORWARD THE COMPLAINT TO INVESTIGATORS.

110. AS OF THIS DATE X 8/10/2022 TIME 1PM I CALL THE N.Y.C BOARD OF CORRECTIONS (212) 669-7900 AND I TOLD A LADY NAME MS. GLOVER ABOUT THE ABUSE OF AUTHORITY I SUFFERED AT THE HANDS OF DOC CORRECTION OFFICIERS AND DOC STAFF, I TOLD MS. GLOVER ABOUT MY VISITING PRIVILEGES BEING TAKEN AWAY FOR NO APPARENT REASON, WHEN SHE LOOKED INTO HER COMPUTER TO SEE IF I GOT ANY VISIT RESTRICTIONS SHE SAID SHE SAW NONE, SHE TOLD ME WHAT THE DOC OFFICERS IS DOING TO ME IS COMPLETELY WRONG, AND SHE WILL SEND SOMEONE TO INVESTIGATE. I ALSO TOLD HER THAT I WAS PLACED IN SOLITARY CONFINEMENT IS THIS UNLAWFUL ? SHE SAID YES



AND TOLD ME THAT SOLITARY CONFINEMENT IS BANNED IN NEW YORK CITY, AND I TOLD MS. GLOVER THAT MY MENTAL HEALTH P.T.S.D I SHOULD NOT BE IN A CELL FOR 23/HOURS EVERYDAY FOR YEARS ON IN, I DON'T POSE A THREAT TO THE SAFETY OF THE JAIL, I TOLD HER THAT I WAS KEPT IN SOLITARY CONFINEMENT AS A FORM OF PUNISHMENT SINCE SOLITARY HAS BEEN OUTLAWED IN NEW YORK CITY, SHE TOLD ME THAT SHE WILL TRY TO SEND SOMEBODY FROM THE BOARD OF CORRECTIONS TO TAKE ME OFF AND OUT OF SOLITARY CONFINEMENT.

111. I ALSO TOLD MS. GLOVER THAT I HAD MONKEY POX FOR THE PAST 3 WEEKS, AND I REPORTED IT TO MEDICAL STAFF 3 DAYS IN A ROW, EACH DOCTOR CLAIMS THAT I DON'T HAVE THE MONKEY POX VIRUS, EVEN THOUGH I SHOWED THEM ALL THE SYMPTOMS LIKE BIG BLISTERS DEVELOPING ON MY LEGS AND FOOT, AS WELL ACCOMPANY BY NUMEROUS HEADACHES, AND COLD SWEATS AND CHILLS, THEY REFUSED TO TEST ME, DOCTOR KALAM TOLD ME THAT THE TEST WAS TOO EXPENSIVE AND THEY WON'T GIVE IT TO INMATES, THIS HURT MY FEELINGS BECAUSE FOR ALMOST 4 WEEKS NOW I'VE BEEN LIVING WITH BLISTERS ALL OVER MY BODY AND NOBODY IS TESTING ME FOR THE MONKEY POX VIRUS, NOR ARE THEY PROVIDING ME WITH THE MONKEYPOX VACCINE. DEFENDANT CITY IS THE BLAME FOR NOT MAKING THE MONKEYPOX VACCINE AVAILABLE TO INMATES INSIDE THE RIKERS ISLAND JAILS, AND NOT TRAINING THE STAFF HERE AT RIKERS ON THE SYMPTOMS OF MONKEYPOX. I'M SUFFERING DEARLY DEALING WITH THE NOT KNOWING IF I'M GOING TO DIE FROM THIS VIRUS, ALL I WANTED TO DO FOR THE PAST 4 WEEKS WAS TO TAKE THE MONKEYPOX TEST TO SEE IF I GOT THE VIRUS OR NOT.

112. AS OF THIS DATE 8/10/2022 I TOLD THE BOARD OF CORRECTIONS ABOUT THE SEXUAL ABUSE I ENCOUNTER BY DOC STAFF AND OFFICERS, I'M DECLARED A VULNERABLE INMATE BY THE DEPARTMENT OF CORRECTIONS SINCE I CONTRACTED AN S.T.D FROM AN OFFICER IN V.C.B.C , MS GLOVER GAVE ME 3 COMPLAINT NUMBERS AND I INCLUDED IT HERE, (1) 2022-1278 (2)2022-1279 (3) 2022-1280. THESE COMPLAINTS ARE ABOUT MONKEYPOX AND WHY THEY REFUSED TO NOT TEST ME HERE ON RIKERS ISLAND, AND SOLITARY CONFINEMENT, AND MY VISITATION PRIVILEGES.

113. AS OF TODAY AUGUST/11/2022 C.O. MASON, AND C.O. KENOL AT 9AM TOLD ME THAT I BETTER WALK AROUND THE HOUSING AREA WITH MY SHIRT OFF OR THEY WILL KEEP ME INSIDE THE CELL FOR 23/HOURS LIKE THE COURT-ORDER STATES, I REPORTED TO TWO FEMALE OFFICERS TO PREA INVESTIGATORS, AND THE PREA INVESTIGATOR NAME SANTIAGO AND MS. GRASSO TOLD ME THAT C.O. KENOL WILL BE PERMANENTLY SEPARATED FROM ME AS WELL AS C.O. MASON, I KEEP XSUFFERING THIS ABUSE AT THE HANDS OF THE CITY.

114. YESTERDAY AUGUST/10/ 2022 OFFICER TABI TOOK THE TEMPATURE OF MY CELL AROUND 10AM ON HOUSING UNIT 2/A AT IT WAS WELL OVER 80 DEGREES, I'M A HEAT SENSITIVE INMATE, AND I'M SUFFERING TERRIBLY THROUGH NOT BEING ABLE TO BREATHE AND GASPING FOR AIR THROUGHOUT THE DAY DUE TO THE HEAT, I'M SUPPOSE TO BE IN HEAT SENSITIVE HOUSING, BUT THE DEPARTMENT OF CORRECTIONS REFUSES TO PLACE ME IN APPROPRIATE HOUSING FOR HEAT SENSITIVE INMATES. I SUFFERED NUMEROUS ASTHMA ATTACKS THROUGH THE SUMMER OF 2022, AND EVEN BEEN TO THE HOSPITAL FOR HEAT EXHAUSTION, WHERE I SPENT FOUR DAY IN BELLEVUE.

115. SOLITARY CONFINEMENT HAS ENDED IN NEW YORK CITY, AND THEY STILL HAVE ME PLACE IN SOLITARY CONFINEMENT 23/HOURS IN MY CELL, NEW YORK CITY HAS DEEMED SOLITARY CONFINEMENT INHUMANE, AS OF THIS DATE I STILL SUFFER FROM MENTALL ISSUES FROM BEING HELD IN A CELL 23/HOURS, I ATTEMPTED SUICIDE NUMEROUS TIMES BECAUSE OF 23/HOURS LOCK-IN MY CELL, THEY STILL HAVE ME IN SOLITARY CONFINEMENT EVEN THOUGH ITS BANNED IN NEW YORK CITY.

116. THEY TOOK MY VISITING PRIVELAGES IN THE MONTH OF JUNE/2022 AND THEY HAD NO REASON TO JUSTIFY WHY THEY TOOK MY PRIVELAGES AWAY, ACCORDING TO THE UNITED NATIONS RULES ON HOW TO TREAT PRISONERS, ITS CALLED THE NELSON MANDELLA RULES, (RULE 3 ) IMPRISONMENT AND OTHER MEASURES THAT RESULT IN CUTTING OFF PERSONS FROM THE OUTSIDE WORLD ARE AFFLICTIVE BY THE VERY FACT OF TAKING FROM THESE PERSONS THE RIGHT OF SELF DETERMINATION BY DEPRIVING THEM OF THIER LIBERTY. THEREFORE THE PRISON SYSTEM SHALL NOT, EXCEPT AS INCIDENTAL TO JUSTIFIABLE SEPARATION OR THE MAINTENANCE OF DISCIPLINE,

AGGRAVATE THE SUFFERING INHERENT IN SUCH A SITUATION, I WAS TOLD TO DROP MY LAWSUITS AND MY VISITS WILL BE RESTORED.

117. AS OF THIS DAY 8/11/2022 AT 4PM OFFICER FROM THE G.R.V.C SECURITY TEAM CAME TO ME WITH FOUR OTHER OFFICERS, TELLING ME I BET NOT COMPLAIN ABOUT BEING A HEAT SENSITIVE INMATE, THIS WAS VERY INTIMIDATING AND I FEAR FOR MY LIFE.

118. AS OF THIS DATE 8/12/2022 TIME 10:30AM IN HOUSING UNIT 2/A IN G.R.V.C I TOOK A COCKTAIL OF 15 PILLS TO END MY LIFE IN THE DAY ROOM AREA OF THE UNIT. C.O. MASON AND C.O. KENOL HAS TOLD ME AGAIN TO WALK AROUND BARECHESTED FOR THIER SEXUAL GRATIFICATIONS AND I'M TOTALLY ABHORRED BY IT.

119. THE LAW ON APRIL 1 2021, NEW YORK GOVERNOR ANDREW M. CUOMO SIGNED INTO LAW TO END LONG TERM SOLITARY CONFINEMENT, AND IT STARTED ON APRIL, 2022, THE NEW LAW, BILL NO. A0227A, SPECIFICALLY STATES UPON PLACEMENT OF AN INMATE INTO SEGREGATED CONFINEMENT, A SUICIDE PREVENTION SCREENING INSTRUMENT SHALL BE ADMINISTERED BY STAFF, IF SUCH A SCREENING REVEALS THAT THE INMATE IS AT RISK OF SUICIDE, APPROPRIATE SAFETY PRECAUTIONS SHALL BE TAKEN, SINCE I'VE BEEN LOCK UP SINCE MARCH 1, 2019 I KWAIN THOMPSON HAS ATTEMPTED SUICIDE OVER 5 TIMES, YET AND STILL THEY HAVE ME IN 23/HOURS/LOCK IN MY CELL, SINCE I HAVE BEEN IN HOUSING AREA 2/A IN G.R.V.C I TRYED TO SET MY CELL ON FIRE TO KILL MYSELF, AND I'VE BEEN ON NUMEROUS SUICIDE WATCHES, AND YET AND STILL THE CITY AND ITS EMPLOYEES STILL HAVE ME ON 23/HOURS LOCKED IN A CELL KNOWING MY MENTAL CONDITION AND NUMEROUS SUICIDE ATTEMPS, THIS IS DELIBERATE INDIFFERENCE IF THE MENTAL HEALTH CLINICIAN FINDS THAT AN INMATE SUFFERS FROM A SERIOUS MENTAL ILLNESS, THAT PERSON SHALL BE DIVERTED OR REMOVE FROM SEGREGATED CONFINEMENT, THIS IS NEW YORK STATE LAW AS OF APRIL 1, 2022.

119. C.O. WALKER AND C.O. LEECH AND CAPTAIN JONES DENIED ME ACCES TO THE COURTS, VIOLATING MY 1ST AMENDMENT RIGHTS, BY KNOWING I'M A PRO-SE LITIGANT IN MY CRIMINAL CASE AND NEED EXTRA TIME, WHICH I WAS NEVER GRANTED AFTER I LET IT BE KNOWN THAT I HAVE A UPCOMING TRIAL, BY LIMITING MY TIME AND BY

AND NOT ALLOWING ME TO ACCESS THE LAW LIBRARY KIOSK AT ALL, AND NOT ALLOWING ME TO CONVERSE WITH THE LAW LIBRARY COORDINATOR IS A VIOLATION OF MY RIGHTS,, I BLAME THE CITY FOR HAVING THIS POLICY AND PRACTICE WHEN IT COMES TO THE LAW LIBRARY.

120. ~~THE CITY ALSO HAVE A POLICY WHEN IT COMES TO HEAT SENSITIVE~~ HOUSING, AND THE JAIL IS NOT FOLLOWING THE HEAT SENSITIVE POLICY, G.R.V.C HAS RETAILIATED AGAINST ME BY KEEPING ME IN A CELL WITH THE TEMPS REACH WELL OVER 100 DEGREEGS IN THE YEAR 2022, AND I TRULY WAS TOTURED AT THE HAND OF THE DEFENDANTS, I WILL NEVER BE THE SAME.

121. I HAVE BEEN INJURED BY NOT HAVING ACCES TO THE LAW LIBRARY, BECAUSE I COULD HAVE ACQUIRED THE KNOWLEDGE TO HAVE MY CHARGES DISMISSED, IF ONLY I WAS ABLE TO STUDY AND RESEARCH AND TO INQUIRE FROM THE LEGAL COORDINATOR, I ALSO HAVE PENDING CIVIL LITIGATION, WUERE I COULDN'T PROPERLY DEFEND MYSELF BECAUSE I DON'T HAVE ACCESS TO THE LEXIS NEXIS INSIDE THE LAW LIBRARY, AND THE LEGAL COORDINATOR DON'T COME TO THE HOUSING UNIT AS SHE IS SUPPOSE TO, I'VE BEEN IN HOUSING UNIT 2/A SINCE OCTOBER/8/2021 AND NOT ONE TIME I GOT THE CHANCE TO SPEAK WITH THE LEGAL COORDINATOR. AND I WAS TOLD BY C.O. WALKER AND C.O. LEECTH THAT THEY GOING TO MAKE ME LOSE TRIAL BY WITHHOLDING MY LAW LIBRARY SERVICES UNTIL I DROP THE PENDING LAWSUITS AGAINST THEIR CO-WORKERS, SO FAR BY C.O. WALKER AND C.O. LEECTH AND CAPTAIN JONES HINDERING ME TO ACCESS THE COURTS AND LAW LIBRARY I HAVE BEEN DENIED ALL MOTIONS I SUBMITTED TO THE JUDGE BURKE AND JUDGE ROSS IN MY CRIMINAL MATTER TO DISMISS THE CHARGES ALL BECAUSE I DIDN'T HAVE THE RIGHT LEGAL TERMINOLOGY IN MY MOTIONS. ME NOT HAVING ACCESS TO THE LAW LIBRARY PREJUDICE ME TOTALLY.

122. ~~EXERY~~ C.O. WALKER, C.O. LEECTH, C.O. PIERCE, C.O. KENOL, CAPTAIN JONES, C.O. RUSSEL, C.O. MASON ALL PLACED ME IN A HOT CELL ON HOUSING UNIT 2/A KNOWING I WAS A HEAT SENSITIVE INMATE, THESE OFFICER WAS DELIBERATELY

INDIFFERENT TO ME, AND I SUFFERED, THROUGH NUMEROUS HEAT WAVES EVEN ATTEMPTED SUICIDE TO GET AWAY FROM THE TORTURE. THESE OFFICERS DID NOT FOLLOW DOC DIRECTIVES WHEN IT COMES TO A HEAT SENSITIVE INMATE. THEY ALL VIOLATED MY 14TH AMENDMENT RIGHT, AND THEY SUBJECTED ME TO CRUEL AND UNUSUAL PUNISHMENTS 8TH AMENDMENT RIGHTS.

123. THESE CORRECTION OFFICERS ALL RETALIATED AGAINST ME BECAUSE THEY HEARD THAT I'M SUING THE WARDEN AND THE CAPTAINS OF G.R.V.C. THE CONDUCT THESE OFFICERS DISPLAYED WAS CONSTITUTIONALLY PROTECTED RIGHTS OF MINE, LIKE TAKEN AWAY MY LAW LIBRARY RIGHTS, TAKEN AWAY MY VISITS FROM FAMILY, KEEPING ME IN A HOT CELL WITH NO AIR CONDITION FOR THE ENTIRE SUMMER, KNOWING I'M A HEAT SENSITIVE INMATE, KEEPING ME IN A CELL FOR 23/HOURS A DAY AS RETALIATION WHEN THEY ALL KNEW THE STATE LAW BANNED SOLITARY CONFINEMENT. AND NO SOLITARY CONFINEMENT ESPECIALLY FOR AN INMATE WITH MENTAL ISSUES SUCH AS ME THE PLAINTIFF. PREVENTING ME FROM DIALING THE PREA HOTLINE IN CASE I GET SEXUAL ABUSE, AND PREVENTING ME FROM DIALING 311 TO MAKE A COMPLAINT AGAINST THE CITY. THEIR CONDUCT WAS SUBSTANTIAL IN RETALIATING, AND THE MOTIVATING FACTOR THAT THESE OFFICERS TOOK WAS TO BACK UP THE BLUE WALL OF SILENCE BETWEEN CORRECTION OFFICERS. MY PENDING LAWSUITS AGAINST THEIR WARDEN AND CAPTAINS MADE THESE OFFICERS RETALIATED IN THE MOST ABUSIVE WAY..

124. I ALSO WANT TO SUBMIT ANOTHER COMPLAINT FROM 311 I FILED AND THAT COMPLAINT # PC-004944, THIS WAS AGAINST C.O. KENOL AND C.O. WALKER. AND HERE IS THE COMPLAINTS THAT I FILED WITH THE BOARD OF CORRECTIONS HER NAME IS MS. GLOVER COMPLAINT # 2022 -1278 #(2) 2022-1279 #(3) 2022-1280, THESE COMPLAINTS WAS LODGE WITH THE BOARD OF CORRECTION CONCERNING 23/HOUR LOCK IN, AND HEAT SENSITIVE HOUSING AND THE MONKEYPOX VIRUS.

125. THIRD CLAIM FOR RELIEF UNDER NEW YORK  
STATE LAW: NEGLIGENCE.

126. PLAINTIFF REPEATS, REITERATES AND REALLEGES EACH AND EVERY ALLEGATION CONTAINED IN THE PRECEDING PARAGRAPHS OF THIS COMPLAINT WITH THE SAME FORCE AND EFFECT AS IF SAME WERE FULLY SET FORTH HEREIN. AT ALL TIMES ALLEGED HEREIN, DEFENDANT CITY WAS CHARGED WITH THE HIRING, TRAINING, RETENTION, DIRECTION, SUPERVISION, DISCIPLINE, OVERSIGHT, APPOINTMENT AND PROMOTION OF ALL CORRECTION OFFICERS, ALL PROSECUTORS, ALL N.Y.P.D OFFICERS, AND ALL HEALTH CARE WORKERS, INCLUDING BUT NOT LIMITED TO THE DEFENDANTS NAMED HEREIN.

127. AT ALL TIMES ALLEGED HEREIN, DEFENDANT CITY, AND STAFF IN ITS EMPLOY, DEFENDANT CITY WAS ENTRUSTED WITH THE CUSTODY, AND CARE OF THOSE PERSONS DETAINED AND CONFINED TO DEPARTMENT OF CORRECTION CUSTODY, INCLUDING BUT NOT LIMITED TO THE PLAINTIFF. AT ALL TIMES ALLEGED HEREIN, DEFENDANT CITY ASSUMED A DUTY OF CARE TO THE PLAINTIFF

128. AT ALL TIMES ALLEGED HEREIN, DEFENDANT CITY WAS ENTRUSTED WITH A SPECIAL DUTY OF CARE TO THE PLAINTIFF, DEFENDANT CITY, ITS AGENTS, EMPLOYEES AND/OR SERVANTS, INCLUDING BUT NOT LIMITED TO DEFENDANTS C.O. MASON C.O. KENOL, C.O. PIERCE, C.O. RUSSEL, C.O. WALKER, C.O. LEECH, CAPTAIN JONES, N.Y.P.D DETECTIVE JAMES QUILTY, N.Y.P.D DETECTIVE JOHN DOE#1, N.Y.P.D DETECTIVE JOHN DOE#2, PROSECUTOR MS. BREEN, PROSECUTOR JAILE CAITLYN, DOCTOR BALAM, DOCTOR ASKARI, NURSE BLOUNT, GINA RANDELL, CITY HEALTH AND HOSPITALS, C.O. BERNIER OWED A DUTY OF CARE TO REASONABLY PROTECT PLAINTIFF WHILE HE WAS IN THIER CUSTODY, CONTROL, AND CARE., DEFENDANT CITY , ITS AGENTS, EMPLOYEES AND/OR SERVANTS, KNEW OR BY REASONABLE DILIGENCE SHOULD HAVE KNOWN, THAT DEFENDANT(S) C.O. MASON, C.O. BERNIER, C.O. KENOL, C.O. CAPTAIN JONES, C.O. PIERCE, C.O. RUSSELL, C.O. WALKER, C.O. LEECH, N.Y.P.D DETECTIVE JAMES QUILTY, DETECIVWE JOHN DOE#1, DETECTIVE JOHN DOE#2, AND PROSECUTORS MS. BREEN, PROSECUTOR JAILE CAITLYN, GINA RANDELL, NURSE BLOUNT,



DOCTOR ASKARI, DOCTOR BALAM WERE ENGAGING IN UNLAWFUL ACTS AGAINST THE PLAINTIFF, DESPITE HAVING NOTICE OF THE UNLAWFUL ACTS, BOTH ACTUAL AND CONSTRUCTIVE, DEFENDANT CITY, NEGLIGENTLY FAILED TO TAKE TIMELY AND SUFFICIENT ACTION TO REMEDY SAME. AND FAILED TO PREVENT THESE ABUSES FROM OCCURRING., DEFENDANT CITY FAILED TO INTERVENE IN EACH INSTANCE ALLEGED SO AS TO MITIGATE THE EXTENT OF PLAINTIFF'S INJURIES, RATHER, DEFENDANT CITY, ENABLED AND PROLONGED THE ABUSE AND VICTIMIZATION BY IGNORING AND/OR COVERING UP THIER FELLOW CO-WORKERS MISCONDUCT.

129. DEFENDANT CITY, KNEW OR SHOULD HAVE KNOWN THAT THIER CARELESS, NEGLIGENT, AND RECKLESS SUPERVISION, INSPECTION, AND CONTROL OVER THE JAILS, N.Y.P.D FORCE, AND MANHATTAN D.A OFFICE, FAILED TO PERFORM SUFFICIENT INSPECTIONS, ROUNDS, SEARCHES AND THE LIKE OF G.R.V.C JAIL, THUS AFFORDING TIME AND OPPORTUNITY TO ABUSE PLAINTIFF THEREAT. DEFENDANT CITY CREATED AN UNREASONABLE RISK OF HARM TO PLAINTIFF AND DID CAUSE PLAINTIFF PHYSICAL EMOTIONAL AND PSYCHOLOGICAL INJURIES, PAIN AND SUFFERING., DEFENDANT CITY, WERE NEGLIGENT IN THIER OWNERSHIP, OPERATION, SUPERVISION, ENFORCEMENT, AND/OR CONTROL OF THE G.R.V.C JAIL, COURTROOM AND JAIL CLINICS, WHERE THE ABUSES OCCURED, IN FAILING TO REASONABLY AND ADEQUATELY SUPERVISE AND CONTROL THE INMATES IN THIER CUSTODY AND CONTROL, INCLUDING BUT NOT LIMITED TO THE PLAINTIFF, IN FAILING TO REASONABLY AND ADEQUATELY SUPERVISE AND CONTROL DOC OFFICERS, SUPERVISORS AND STAFF, N.Y.P.D, PROSECUTORS, UNDER THIER DIRECTION AND CONTROL, IN FAILING TO PROTECT THE HEALTH AND WELFARE OF THE PLAINTIFF, IN FAILING TO PROVIDE THE PLAINTIFF WITH REASONABLY SAFE LIVING CONDITIONS WHILE HE WAS CONFINED TO THIER CUSTODY AND CONTROL; IN THE NEGLIGENT SUPERVISION OF THE PLAINTIFF; IN FAILING TO QUICKLY AND DILIGENTLY INTERCEDE ON PLAINTIFF'S BEHALF; IN SETTING A TRAP FOR THE PLAINTIFF; IN FAILING TO TAKE COGNIZANCE OF A DANGEROUS AND ESCALATING SITUATION; IN FAILING TO HAVE AN ADEQUATE POLICY TO CURTAIL OFFICER-ON-INMATE ABUSE, MEDICAL STAFF-ON-INMATE ABUSE, PROSECUTOR ON INMATE ABUSE

AND VICTIMIZATION, IN FAILING TO TAKE REASONABLE MEASURES AND PRECAUTIONS TO AVOID AND/OR MITIGATE THE INCIDENCE OF OFFICER-ON-INMATE ABUSE, N.Y.P.D. ON-INMATE ABUSE, PROSECUTORS-ON-INMATE ABUSE, MEDICAL STAFF-ON-INMATE ABUSE. AND VICTIMIZATION, IN VIOLATING THE PLAINTIFF'S CIVIL, STATUTORY AND COMMON LAW RIGHTS, IN INFRINGING UPON THE FREEDOM AFFORDED TO THE PLAINTIFF; IN BEING DELIBERATELY INDIFFERENT TO PLAINTIFF'S HEALTH, SAFETY, AND SECURITY, IN ALLOWING/ CREATING UNLAWFUL JAIL CONDITIONS TO BE AND REMAIN, IN HAVING A POLICY, EITHER WRITTEN OR BY CUSTOM, WHICH TURNS A BLIND EYE TO OFFICER-ON-INMATE ABUSE AND VICTIMIZATION, IN HAVING A POLICY, EITHER WRITTEN OR BY CUSTOM, WHICH ACCEPTS OFFICER DISINTEREST, INDIFFERENCE AND/OR UNINVOLVEMENT DURING INCIDENTS OF OFFICERS-ON-INMATES ABUSE AND VICTIMIZATION; IN HAVING A POLICY, EITHER WRITTEN OR BY CUSTOM, IN FAILING TO PREVENT AND/OR MITIGATE THE SUBJECT INCIDENTS DESPITE HAVING NOTICE, TIME AND OPPORTUNITY TO DO SO; IN FAILING TO ADEQUATELY DISCIPLINE AND/OR SEGREGATE DEFENDANTS CORRECTION OFFICERS, C.O. WALKER, C.O. LEECH, C.O. MASON, C.O. KENOL, C.O. PIERCE, C.O. RUSSEL, C.O. CAPTAIN JONES, C.O. BERNIER, DOCTOR ASKARI, NURSE BLOUNT, DOCTOR BALAM, FOLLOWING REPORTED INCIDENTS OF ABUSE AND VICTIMIZATION IN PERMITTING PLAINTIFF TO BE LEFT UNATTENDED AND UNSUPERVISED WITH THE CORRECTION OFFICERS DEFENDANTS. 130.

130. IN FAILING TO FULLY, FAITHFULLY AND REASONABLY INVESTIGATE PLAINTIFF ALLEGATIONS AND PRIOR ALLEGATIONS, IN BEING NEGLIGENT TOWARDS THE PLAINTIFF'S HEALTH, SAFETY, AND SECURITY IN CAUSING AND ALLOWING A DANGEROUS PLACE FOR PRISONERS; IN CAUSING AND/OR ALLOWING UNLAWFUL CONDITIONS TO BE AND REMAIN; IN HAVING A POLICY, EITHER WRITTEN OR BY CUSTOM, WHICH ACCEPTS AND/OR PROMOTES DISINTEREST, INDIFFERENCE, APATHY AND/OR UNINVOLVEMENT DURING INCIDENTS OF ABUSE AND VICTIMIZATION, IN FAILING TO ADEQUATELY TRAIN MEDICAL STAFF, IN FAILING TO TRAIN PERSONNEL; IN CAUSING AND/OR ALLOWING THE PLAINTIFF TO BE HARMED, IN FAILING TO TAKE ME TO MY FOLLOW -UP APPOINTMENTS WITH PRIAPISM, IN FAILING TO TAKE ME TO THE URULOGIST FOR MY PRIAPISM FOLLOW-UP, LEFT ME WITH ERECTILE DYSFUNCTION. IN

IN CAUSING AND CREATING A DANGEROUS AND HAZARDOUS CONDITION TO EXIST;  
 IN CREATING AND ALLOWING A NUISANCE TO EXIST; IN FAILING TO PROVIDE FOR THE  
 SAFETY OF THE PLAINTIFF; INFAILING TO ADEQUATELY TRAIN THE CORRECTION  
 OFFICERS, AND MEDICAL STAFF, N.Y.P.D OFFICERS AND PROSECUTORS, CHARGED  
 WITH MAINTAINING SECURITY OF THE SUBJECT LOCATIONS AND CONTROL; THAT THE  
 OCCURRENCES ALLEGED HEREIN WOULD NOT HAVE OCCURRED BUT FOR THE NEGLIGENCE  
 OF THE DEFENDANTS; IN CAUSING, PERMITTING AND/OR ALLOWING THE PLAINTIFF  
 TO BE ABUSED AND VICTIMIZED, AND SAID DEFENDANTS WERE OTHERWISE NEGLIGENT,  
 CARELESS AND RECKLESS IN THE INSTANCE.

131. INASMUCH AS DEFENDANTS, DETECTIVE JAMES QUILTY, DETECTIVE JOHN DOE#1  
 DETECTIVE JOHN DOE#2, GINA RANDELL, PROSECUTOR MS. BREEN, PROSECUTOR  
 JAILE CAITLYN, C.O. BERNIER, C.O. MASON, C.O. KENOL, C.O. PIERCE, C.O.  
 RUSSEL, C.O. WALKER, C.O. LEECH, C.O. CAPTAIN JONES, DOCTOR ASKARI, NURSE  
 BLOUNT, DOCTOR BALAM AS OTHER AGENTS~~SE~~ EMPLOYEES OF DEFENDANT CITY, WERE  
 ACTING FOR, UPON, AND IN FURTHERANCE OF THE BUSINESS OF THIER EMPLOYER,  
 DEFENDANT CITY, AND WITHIN THE SCOPE OF THIER EMPLOYMENT, DEFENDANT CITY  
 IS LIABLE UNDER THE DOCTRINE OF RESPONDEAT SUPERIOR FOR THE TORTIOUS  
 ACTIONS OF ITS AGENTS, EMPLOYEES AND/OR SERVANTS, AS A RESULT OF THE  
 FOREGOING, PLAINTIFF SUFFERED AND CONTINUES TO SUFFER SEVERE AND PERMANENT  
 PHYSICAL, PSYCHOLOGICAL AND EMOTIONAL INJURIES, PAIN AND SUFFERING.

FOURTH CLAIM FOR RELIEF UNDER NEW YORK STATE  
 LAW: NEGLIGENT, HIRING, TRAINING, RETENTION

132. PLAINTIFF REPEATS, REITERATES AND REALLEGES EACH AND EVERY ALLEGATION  
 CONTAINED IN THE PRECEDING PARAGRAPHS OF THIS COMPLAINT WITH THE SAME FORCE  
 AND EFFECT AS IF ~~X~~ <sup>K</sup> SAME WERE FULLY SET FORTH HEREIN

133. THE OFFENSES ALLEGED~~X~~ HEREIN RESULTED, IN WHOLE OR IN PART, DUE TO  
 THE FAILURE OF DEFENDANT CITY TO EMPLOY QUALIFIED PERSONS FOR POSITIONS  
 OF AUTHORITY, AND/OR TO PROPERLY OR CONSCIENTIOUSLY TRAIN AND SUPERVISE  
 THE CONDUCT OF SUCH PERSONS DURING THIER EMPLOYMENT, AND/OR TO PROMULGATE  
 APPROPRIATE OPERATEING POLICIES AND

PROCEDURES EITHER FORMALLY OR BY CUSTOM TO PROTECT THE RIGHTS OF THOSE PERSONS CONFINED TO THIER CUSTODY AND CONTROL, INCLUDING BUT NOT LIMITED TO THE PLAINTIFF.134,

134. DEFENDANT CITY WAS NEGLIGENT IN ITS HIRING, TRAINING, RETENTION, SUPERVISION, DIRECTION, CONTROL, APPOINTMENT AND/OR PROMOTION OF ITS EMPLOYEES, AGENTS AND/OR SERVANTS, INCLUDING BUT NOT LIMITED TO EACH DEFENDANTS NAMED HEREIN.

135. THE FAILURE OF DEFENDANT CITY TO ADEQUATELY TRAIN ITS EMPLOYEES, AGENTS AND/OR SERVANTS, INCLUDING BUT NOT LIMITED TO EACH OF THE DEFENDANTS NAMED HEREIN, IN THE EXERCISE OF THIER EMPLOYMENT FUNCTIONS, AND THIER FAILURE TO ENFORCE THE UNITED STATES CONSTITUTION, THE LAWS OF THE STATE OF NEW YORK, AND THE RULES AND REGULATIONS OF THE CITY OF NEW YORK, IS EVIDENCE OF THE RECKLESS LACK OF CAUTIOUS REGARD FOR THE RIGHTS OF THOSE PERSONS IN THIER CUSTODY, INCLUDING THE PLAINTIFF HEREIN, AND EXHIBITED A LACK OF THAT DEGREE OF DUE CARE WHICH PRUDENT AND REASONABLE INDIVIDUALS WOULD SHOW.

136. DEFENDANT CITY WAS CARELESS AND RECKLESS IN HIRING, APPOINTING, ,RETAINING, PROMOTING AND SUPERVISING THIER EMPLOYEES, AGENTS AND/OR SERVANTS, INCLUDING BUT NOT LIMITED TO EACH OF THE DEFENDANTS NAMED HEREIN, IN THAT SAID EMPLOYEES LACKED THE EXPERIENCE, ABILITY, AND JUDGEMENT TO BE EMPLOYED BY THE CITY AND BESTOWED WITH THE AUTHORITY GIVEN TO THEM; IN FAILING TO EXERCISE DUE CARE AND CAUTION IN THIER HIRING, APPOINTMENT AND PROMOTION PRACTICES, AND IN PARTICULAR HIRING THE DEFENDANT-EMPLOYEES WHO LACKED THE MENTAL CAPACITY, JUDGEMENT, AND ABILITY TO FUNCTION AS EMPLOYEES OF SAID DEFENDANTS; IN THAT DEFENDANT-EMPLOYEES LACKED MATURITY, JUDGEMENT, SENSIBILITY AND INTELLIGENCE TO BE EMPLOYED BY DEFENDANT CITY; IN THAT DEFENDANT CITY KNEW OR SHOULD HAVE KNOWN OF THE LACK OF ABILITY, JUDGEMENT, EXPERIENCE AND MATURITY OF THE DEFENDANT-

EMPLOYEES WHEN THEY HIRE THEM; IN THAT THE DEFENDANT CITY, ITS AGENTS SERVANTS AND/OR EMPLOYEES, FAILED TO SUSPEND AND/OR TERMINATE THE DEFENDANT-EMPLOYEES WHEN SUCH ACTION WAS REQUIRED AND NECESSARY; AND IN BEING OTHERWISE CARELESS, NEGLIGENT AND RECKLESS IN THE INSTANCE.

~~137. DEFENDANT CITY KNEW OR SHOULD HAVE KNOWN IN THE EXERCISE OF REASONABLE~~  
CARE, THE PROPENSITIES OF EACH OF THE DEFENDANTS NAMED HEREIN TO ENGAGE IN THE WRONGFUL CONDUCT HERETOFORE ALLEGED IN THIS COMPLAINT. THE AFORESAID ACTS AND OMISSIONS OF DEFENDANT CITY, ITS EMPLOYEES, AGENTS AND/OR SERVANTS, INCLUDING BUT NOT LIMITED TO EACH OF THE DEFENDANTS NAMED HEREIN, RESULTED IN THE PLAINTIFF BEING ABUSED AND VICTIMIZED.

138. DEFENDANT CITY KNEW OR SHOULD HAVE KNOWN THAT ITS POLICIES, CUSTOMS, AND PRACTICES, AS WELL AS ITS NEGLENT SUPERVISION, TRAINING, APPOINTMENT AND PROMOTION OF ITS EMPLOYEES, AGENTS AND/OR SERVANTS, INCLUDING BUT NOT LIMITED TO EACH OF THE DEFENDANTS NAMED HEREIN, CREATED AN ATMOSPHERE WHERE THE MOST PROMINENT OFFENDERS FELT ASSURED THAT THIER MOST BRAZEN ACTS OF MISCONDUCT AND NEGLECT WOULD NOT BE SWIFTLY AND EFFECTIVELY INVESTIGATED AND PROSECUTED.

139. THE ABUSE AND VICTIMIZATION OF THE PLAINTIFF, AS SET FORTH ABOVE, WERE THE REASONABLY FORESEEABLE CONSEQUENCE OF DEFENDANTS CITY'S NEGLIGENT CONDUCT.

140. THE AFORESAID NEGLIGENCE OF DEFENDANT CITY IN ITS HIRING, SCREENING, RETENTION, SUPERVISION, TRAINING, APPOINTMENT AND PROMOTION PRACTICES RESULTED IN THE HARASSMENT, ABUSE, INTINIDATION, AND VICTIMIZATION OF PLAINTIFF, PLAINTIFF'S ABUSES BY DEFENDANTS JAMES QUILTY, DETECTIVE JOHN DOE#1 C.O. WALKER, DETECTIVE JOHN DOE #2 , C.O. LEECH, PROSECUTOR MS. BREEN, GINA RANDELL, PROSECUTOR JAILE CAITLYN, C.O. BERNIER, C.O. MASON, C.O. PIERCE, C.O. KENOL, C.O. RUSSEL, C.O. CAPTAIN JONES, DOCTOR ASKARI, DOCTOR BALAM, NURSE BLOUNT, BEING TRIVIALIZED, MINIMIZED AND/OR COVERED-UP; THE CAUSE, NATURE AND EXTENT OF THE PLAINTIFF'S STATUTORY AND COMMON LAW RIGHTS BEING VIOLATED; AND PLAINTIFF TO SUFFER SEVERE AND PERMANENT PHYSICAL, PSYCHOLOGICAL AND EMOTIONAL INJURIES, PAIN AND SUFFERING.

FIFTH CLAIM FOR RELIEF UNDER NEW YORK STATE LAW: INTENTIONAL  
AND NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

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141. PLAINTIFF REPEATS, REITERATES AND REALLEGES EACH AND EVERY ALLEGATION  
~~CONTAINED IN THE PRECEDING PARAGRAPHS OF THIS COMPLAINT WITH THE SAME~~  
FORCE AND EFFECT AS IF SAME WERE FULLY SET FORTH HEREIN.

142. AS SET FORTH ABOVE, DEFENDANTS, C.O MASON, C.O. KENOL, C.O. PIERCE  
C.O.WALKER. C.O. LEECH, C.O. RUSSEL, C.O. BERNIER, C.O. CAPTAIN JONES,  
GINA RANDELL, DOCTOR ASKARI, DOCTOR BALAM, NURSE BLOUNT, CITY OF NEW YORK,  
DETECTIVE JAMES QUILTY, .DETECTIVE JOHN DOE#1 , DETECTIVE JOHN DOE #2,  
PROSECUTOR MS. BREEN, PROSECUTOR JAILE CAITLYN AFORESAID CONDUCT WAS  
INTENTIONAL, MALICIOUS AND EXCESSIVE, AND SERVED NO REASONABLE OR  
PENOLOGICAL INTEREST. THE AFORESAID CONDUCT WAS INTENTIONAL, RECKLESS,  
AND/OR GROSSLY NEGLIGENT, THE DEFENDANTS INTENTIONAL, RECKLESS AND/OR  
NEGLEGENT CONDUCT ALLEGED HEREIN WAS OF AN EGREGIOUS AND OUTRAGEOUS  
NATURE THAT EXCEEDS ALL BOUNDS USUALLY TOLERATED BY SOCIETY AND UNREASON-  
ABLY ENDANGERED PLAINTIFF'S PSYCHOLOGICAL AND EMOTIONAL WELL-BEING.

143. AS A RESULT OF THE FORE GOING, PLAINTIFF'S SUFFERED AND CONTINUES  
TO SUFFER SEVERE AND PERMANENT AND EMOTIONAL INJURIES.

144. PLAINTIFF WILL CONTINUE TO SUSTAIN IN THE FUTURE, PHYSICAL INJURY,  
PAIN AND SUFFERING, SERIOUS AND SEVERE PSYCHOLOGICAL AND EMOTIONAL DISTRESS,  
MENTAL ANGUISH, EMBARRASSMENT, AND HUMILIATION.

JURY DEMAND

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PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY OF ALL ISSUES IN THIS MATTER.  
PLAINTIFF RESPECTFULLY REQUEST THE FOLLOWING RELIEF, JOINTLY AND SEVERALLY,  
AS AGAINST EACH OF THE DEFENDANTS: AN AWARD OF COMPENSATORY DAMAGES AGAINST  
ALL DEFENDANTS IN AN AMOUNT TO BE DETERMINED AT TRIAL; AN AWARD OF PUNITIVE  
DAMAGES AGAINST ALL DEFENDANTS NAMED HEREIN, IN AMOUNT TO BE DETERMINED AT  
TRIAL, SUCH OTHER RELIEF THIS COURT DEEM JUST AND PROPER.



SIXTH CLAIM FOR RELIEF UNDER NEW YORK STATE LAW: INTENTIONAL  
MALICIOUS PROSECUTION BY MANHATTAN DISTRICT ATTORNEY'S OFFICE.

145. PROSECUTOR MS. BREEN DID ~~YEH~~ USE FALSE TESTIMONY AT MY TRIAL, BY PRESENTING PERJURED GRAND JURY TESTIMONY, WHICH MS. BREEN DID KNOWINGLY ~~AFTER SHE SEEN A VIDEO STATE CONFESSION BY COMPLAINING WITNESS MADE BY~~ COURT APPOINTED PRIVATE INVESTIGATOR ( MR. GAZZOLO ) COMPLAINING WITNESS SAID SHE LIED ON ME BECAUSE SHE WAS JEALOUS AND BECAUSE SHE WAS A WOMAN SCORN. AFTER MS. BREEN DID SEE THIS VIDEO SHE STILL CHOSE TO PROSECUTE THE CASE WITH NO EVIDENCE, COMPLAINING WITNESS WAS THE SOLE EYEWITNESS TO THE CRIME, WHICH SHE CONFESS THAT SHE LIED ON ME KWAIN THOMPSON. MS. BREEN DID NOT PRESS CHARGES OR SEEK AND INDICTMENT FOR COMPLAINING WITNESS (GINA RANDELL ) FOR PERJURY , SHE MADE A VIDEO STATING SHE LIED, AND NOTHING HAPPEN TO THE COMPLAINING WITNESS FOR TELLING THAT LIE, I LOST 3 YEARS OF MY LIFE, FOR NOTHING TO HAPPEN TO THE WOMAN WHO LIED ON ME ? THE UNITED STATES ATTORNEY GENERAL ( MERRICK GARLAND ) THE COURTS MUST APPLY THE LAW EVENLY AND WITHOUT FAVOR. MS. BREEN TOLD COMPLAINING WITNESS THAT SHE WILL NOT NOTIFY HER GEORGIA PROBATION OFFICER ABOUT HER WHEREABOUTS, THIS IS THE FAVOR SHE GRANTED THE COMPLAINING WITNESS IF SHE CONTINUE TO GIVE PERJURED TESTIMONY, MS. BREEN ALSO HEARD RECORDED JAIL CALLS WHERE THE COMPLAINING WITNESS WENT TO THE GRAND JURY AND GAVE PERJURED TESTIMONY, ALL BECAUSE SHE WAS A WOMAN SCORN AND CAN'T NOBODY HOLD HER ACCOUNTABLE FROM WHAT SHE FELT IN HER HEART. AFTER MS. BREEN HEARD THESE JAILS CALLS WHERE COMPLAINING WITNESS IS ADMITTING SHE PERJURED HERSELF, PROSECUTOR STILL CHOSE TO MALICIOUSLY PROSECUTE ME AND NOT HAVE HER COMPLAINING WITNESS ARRESTED.

146. PROSECUTOR JAILE CAITLYN CONSPIRE WITH JAMES QUILTY TO BOTCH THE INVESTIGATION OF COMPLAINING WITNESS ( GINA RANDELL )BY NOT INVESTIGATING AT ALL, JAMES QUILTY HAS BEEN SUED NUMEROUS TIMES FOR RACIAL PROFILING, AND THE CITY PAID OUT ENORMOUS AMOUNT FOR HIS BAD BEHAVIOR AGAINST MINORITEIS, THEY HELP GINA RANDELL COME UP WITH THE LIES AND THEY MADE THE LIE AIR-TIGHT BY NOT INVESTIGATING NOTHING, BECAUSE IF THEY BID A COMPLETE INVESTIGATION THE LIE WOULD NOT HOLD UP IN COURT, SO GINA RANDELL MADE A VIDEO A YEAR LATER TO COURT APPOINTED PRIVATE INVESTIGATOR ( MR. GAZZOLO ) SAYING SHE LIED ON KWAIN THOMPSON BECAUSE SHE WAS A WOMAN SCORN , AND SHE KNEW EXACTLY WHAT TO SAY AND DO TO KEEP ME LOCK UP, WITH THE HELP OF JAMES QUILTY AND JAILE CAITLYN , AND IT WORK FOR OVER THREE YEARS OF PURE TORTURE FOR PLAINTIFF. PROSECUTOR JAILE CAITLYN DID NOT LOCK UP-NOR=SEEK INDICTMENT OF HER COMPLAINING WITNESS ONCE SHE VIEWED THE CONFESSION TAPE MADE BY GINA RANDELL, THE UNITED STATES DEPARTMENT OF JUSTICE BOLDLY STATES; THAT THE LAW SHOULD BE APPLIED EVENLY AND WITHOUT FAVOR, AND JAILE CAITLYN MADE A FAVOR TO GINA RANDELL THAT IF SHE KEEP UP WITH THE PERJURED TESTIMONY SHE WILL NOT TELL THE GEORGIA DEPARTMENT OF PROBATION WHERE SHE'S HIDING AT IN NEW YORK CITY; AND SHE PROMISE GINA RANDELL THAT SHE CAN COME TO HER OFFICE WHENEVER SHE FEELS LIKE IT TO PICK UP 15\$ WHICH GINA RANDELL TOOK ADVANTAGE OF TOTALLY BY VISITING THE D.A OVER 50 TIMES, FOR NOTHING JUST TO GET THE MONEY. JAILE CAITLYN ALSO HEARD NUMEROUS JAIL CALLS WHERE COMPLAINING WITNESS BOLDLY STATES THAT SHE WENT TO THE GRAND JURY AND PERJURED HERSELF BECAUSE SHE WAS A WOMAN SCORN AND CAN'T NOBODY HOLD HER ACCOUNTABLE FOR WHAT SHE FELT IN HER HEART AT THAT MOMENT. PROSECUTOR DID NOT ARREST NOR SEEK INDICTMENT OF COMPLAINING WITNESS ONCE SHE FOUND OUT WITNESS HAD TOLD A LIE, SHE STILL PRESENTED THIS FALSE TESTIMONY TO THE COURTS WHICH IS ILLEGAL ONCE YOU KNOWINGLY KNOW ITS FALSE TESTIMONY. THIS IS BAD FAITH CLAIM AGAINST BOTH PROSECUTORS AND DETECTIVES WHO WORK THE CASE. SHE CHANGE THE TRANSCRIPTS OF JAIL CALLS SO I CAN LOSE MY RIGHTS TO CONFRONT MY ACCUSER.

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## STATEMENT OF FACTS

## SEVENTH CLAIM FOR RELIEF UNDER NEW YORK STATE LAW:

DELIBERATE INDIFFERENCE, INADEQUATE MEDICAL TREATMENT OF SERIOUS  
MEDICAL CONDITIONS.

147. C.O. MASON, C.O. KENOL, C.O. BERNIER, C.O. PIERCE, C.O. RUSSELL  
C.O. WALKER, C.O. LEECH, C.O. CAPTAIN JONES, NURSE BLOUNT, DOCTOR ASKARI  
DOCTOR KAL; AM ON OR ABOUT MAY 1 2022 I INFORMED THE CORRECTIONS OFFICERS  
AND MEDICAL STAFF HERE AT G.R.V.C THAT I'M A CHRONIC ASTHMATIC AND THE  
HEAT TRIGGERS ASTHMA ATTACK, AND THAT I NEED HEAT SENSITIVE HOUSING,  
CORRECTION OFFICERS ALL NAMED ABOVE, TOLD ME THAT I WILL NOT GET HEAT  
SENSITIVE HOUSING UNLESS I DROP THE LAWSUITS, I TOLD THEM I WILL NOT DROP  
MY LAWSUITS AND I'VE BEEN SUFFERING<sup>NG</sup> EVERY SINCE. I ALSO TOLD THE DOCTORS  
ABOUT MY<sup>SE</sup>NSITIVE HEAT ISSUES, AND WAS TOLD BY THE DOCTORS AND NURSE  
THAT I MUST DROP THE LAWSUITS TO GET PROPER MEDICAL ATTENTION IN DCC.

I ALSO INFORM THE CORRECTIONS OFFICERS LISTED ABOVE ABOUT MY REOCCURRING  
PRIAPISM AND THAT I NEED TO SEE A UROLOGIST FOR FOLLOW-UPS, IF I DON'T  
SEE A UROLOGIST I CAN DEVELOP ERECTILE DYSFUNCTION, WHICH I DEVELOP SINCE  
THE ALMOST 2 YEAR DELAY, I INFORMED THE DOCTOR ASKARI, AND DOCTOR KALAM,  
AND NURSE BLOUNT ABOUT MY PAINFUL REOCCURRING PRIAPISM AND THEY ALL TOLD  
ME I BETTER DEAL WITH LIKE A MAN. THEY TOLD ME TO TAKE CARE OF IT WHEN  
YOU GET RELEASED FROM JAIL. I TOLD THEM CAN THEY PLEASE SEND ME TO A  
UROLOGIST BECAUSE I DON'T WANT ERECTILE DYSFUNCTION, THEY TOLD ME ITS  
SUITABLE FOR A RAPIST SUCH AS YOURSELF. AS OF THIS DATE I STILL FEEL THE  
PAIN FROM MY PRIAPISM AND THEY REFUSE TO SEND ME TO A SPECIALIST. 8/15/2022./

148. I ALSO INFORMED~~X~~ ALL CORRECTIONS OFFICERS WHO ARE DEFENDANTS IN THIS  
SUIT THAT I'M SUFFERING FROM MONKEYPOX AND I HAVE ALL THE SYMPTOMS, AND  
THE PAIN IS SEVERE, NONE OF THEM WILL HELP ME GET TO THE CLINIC, AND TOLD  
ME THAT I'M HALLUCINATING, I SHOW THEM THE BLISTERS AND RASH THAT PLAGUE  
MY EXTREMITIES

AND THE ANGUISH I'VE BEEN EXPERIENCING FOR WELL OVER 2 MONTHS, THEY SIMPLY TOLD ME YOU DESERVE TO HAVE MONKEYPOX FAGGOT./

149. I ALSO TOLD THE DOCTOR ASKARI, DOCTOR BALAM, NURSE BLOUNT, AND OTHER MEMBERS OF THE CITY HEALTH AND HOSPITAL STAFF THAT I'M SUFFERING FROM THE MONKEYPOX VIRUS AND I ASK THEM NUMEROUS TIMES TO TEST ME FOR THE MONKEYPOX VIRUS. AND THEY TOLD ME THAT THEY WILL NOT TEST ME BECAUSE THE TEST IS EXPENSIVE, AND I WAS EVEN TOLD THAT I'M GAY AND I BESERVE TO GET THAT VIRUS, I BETTER BE LUCKY THAT I DON'T CATCH AIDS. THE BLISTERS THAT COVERS ME IS EXTREMELY PAINFUL, MONKEYPOX IS A PANDEMIC IN NEW YORK CITY AS OF THIS DATE 8/1/2022 AND RIKERS ISLAND IS NOT GIVING ME THE TREATMENT NOR THE VACCINE FOR MONKEY POX WHICH I REQUESTED OVER 50 TIMES TO NO AVAIL.

150. ON JULY 28, 2022 JUDGE ROSS SIGNED A COURT ORDER TELLING THE DEPARTMENT OF CORRECTION TO HAVE ME TESTED FOR THE MONKEY POX VIRUS. ON JULY 28, 2022 I HAD A COURT DATE AND JUDGE ROSS REFUSE TO ALLOW ME INSIDE HIS COURTROOM BECAUSE HE GOT A LETTER I WROTE TO HIM TELLING HIM THAT RIKER'S ISLAND IS NOT TESTING ME FOR MONKEYPOX EVEN THOUGH I'M EXPERIENCING ALL THE SYPTOMS, , THE MOST SERIOUS SYMPTOMS THE BIG BLISTERS WHICH JUST HURTS LIKE HELL.

151. ALL MY SERIOUS MEDICAL CONDITIONS CAN CAUSE DEATH AND I EXPLAIN THAT TO THE CORRECTION OFFICERS AND I EXPLAIN THAT TO THE MEDICAL STAFF. I'M STILL SUFFERING IN A HOUSING UNIT WITH NO AIR CONDITONING FOR A HEAT SENSITIVE INMATES, AND THE BLISTERS HAS NOT GONE AWAY OFF MY BODY, AND THE RASH IS SPREADING RAPIDLY ACROSS MY BODY, WITH NO MEDICATION. DEPRIVATION OF LIBERTY BECAUSE I CAN'T ENTER THE COURTROOM IN MY CRIMINAL MATTER UNLESS I GET TESTED FOR THE MONKEYPOX, WHICH DOC REFUSE AND MEDICAL STAFF REFUSE., I'M BEING DENIED A FAIR TRIAL, BECEUSE OF NO TESTING FOR MONKEYPOX.

152. C.O. BERNIER, C.O. MASON, C.O. PIERCE DID NOT TAKE ME TO THE CLINIC WHEN I TOLD THEM I FELT PAIN FROM PRISM, AND THEY DID NOT TAKE ME TO THE CLINIC WHEN I TOLD THEM ~~MM~~ W MONKEYPOX VIRUS IS CAUSING ME SO MUCH PAIN FROM BLISTERS AND HEADACHES, AND RASH ALL OVER ME. THEY DID NOT MOVE ME TO HEAT SENSITIVE HOUSING ONCE I TOLD THEM I'M HEAT SENSITIVE.

153. C.O.WALKER, C.O. RUSSEL, C.O. LEECH, C.O.KENOL; CAPTAIN JONES DID NOT TAKE ME TO THE CLINIC WHEN I TOLD THEM I FEEL PAIN FROM PRIAPISM, AND ~~THEY DID NOT TAKE ME TO THE CLINIC WHEN I TOLD THEM THE MONKEYPOX VIRUS~~ IS CAUSING ME SO MUCH PAIN, FROM THE BLISTERS AND RASH THAT HURTING ME FOR WELL OVER A MONTH. AND THEY DID NOT MOVE ME ONCE I TOLD THEM I WAS A HEAT SENSITIVE INMATE, I TOLD THEM TO PLACE ME IN HEAT SENSITIVE HOUSING.

154. DOCTOR ASKARI, DOCTOR KALAM, NURSE BLOUNT DID NOT TREAT ME OR VACCINATE ME FOR MONKEYPOX VIRUS THAT I SUFFER FROM, I SHOW THEM BLISTERS THAT HURT, I SHOWED THEM RASHES, AND TOLD THEM I HAVE MIGRAINS HEADACHES THAT DON'T GO AWAY, AND I WILL LIKE TO GET TESTED FOR MONKEYPOX, THEY DENIED TO TEST ME, AND THEY DENIED TO VACCINATE ME, AND THEY DENIED ME MEDICATION TO TREAT THE MONKEY POX VIRUS. THEY ALSO FAILED TO PLACE ME IN HEAT SENSITIVE HOUSING. THEY ALSO FAILED TO SEND ME TO A UROLOGIST FOR FOLLOW-UP FOR PRIAPISM, AND I TOLD THEM I'M SCARED TO GET (E.D) ERECTILE DYSFUNCTION, I PLEADED WITH THE MEDICAL STAFF THAT THEY DON'T ALLOW ME TO GET ( E.D) AND TO TREAT THE PAIN SINCE MY SURGERY AND THEY FAILED.

152. PLAINTIFF COMMENCES THIS ACTION PURSUANT TO 42 U.S.C & 1983 SEEKING COMPENSATORY AND PUNITIVE DAMAGES AGAINST DEFENDANTS, SHERMA DUNBAR WARDEN, WARDEN RENEE FOR VIOLATING MY RIGHTS WHILE ACTING UNDER COLOR OF LAW. PLAINTIFF ALSO ASSERTS SUPPLEMENTAL STATE LAW CLAIMS AGAINST SHERMA DUNBAR WARDEN, WARDEN RENEE, FOR VIOLATIONS OF THEIR STATUTORY AND COMMON LAW DUTIES, ABUSE, NEGLIGENCE, TRAINING, SUPERVISION AND RETENTION, INTENTIONAL AND NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS, AND VIOLATIONS OF NEW YORK CITY ADMINISTRATIVE CODE & 10-1101 et seq.

153. AT ALL TIMES MENTIONED HEREIN, DEFENDANT WARDEN RENEE WAS ACTING UNDER COLOR OF LAW. WARDEN RENEE IS BEING SUED IN HIS INDIVIDUAL AND OFFICIAL CAPACITIES.

154. AT ALL TIMES MENTION HEREIN, DEFENDANT WARDEN RENEE WAS A WARDEN EMPLOYED BY THE CITY OF NEW YORK.

155. AT ALL TIMES MENTIONED HEREIN, DEFENDANT SHERMA DUNBAR WAS ACTING UNDER COLOR OF LAW. WARDEN SHERMA DUNBAR IS BEING SUED IN HER INDIVIDUAL AND OFFICIAL CAPACITIES.

156. AT ALL TIMES MENTIONED HEREIN, DEFENDANT SHERMA DUNBAR WAS A WARDEN EMPLOYED BY THE CITY OF NEW YORK.

157. DEFENDANT C.O. KENOL TOLD ME IN THE MONTHG OF JUNE/2022 THAT SHE WANT ME TO MASTURBATE INFRONT OF HER WHILKE SHE SIT ON THE B-POST WITH ME CELL DOOR OPEN SO SHE CAN LOOK AND I WILL BE REWARDED WITH EXTRA TIME OUT MY CELL BECAUSE AT ANY MOMENT SHE CAN FOLLOW MY COURT ORDER AND KEEP ME LOCK IN, I ONLY OBLIGED HER BECAUSE INSIDE THE CELL IF PASS 100 DEGREES.

158. DEFENDANT C.O. MASON TOLD ME SHE IS THE A OFFICER AND THAT I BETTER COME OUT THE SHOWERS WITH JUST MY DRAWS ON, AND I BETTER BE FULLY ERECT SO SHE CAN SEE AND PLAY WITH HERSELF WHILE SHE ON HER A-POST, AND IF I LISTEN TO HER WISHES, I WILL NEVER BE LOCK IN MY HOT CELL FOR 23/HOURS OUT THE DAY, I WAS TOLD THIS BEGINNING OF THE SUMMER OF 2022. I FELT SO MUCH SHAME.

159. DEFENDANT C.O. BERNIER TOLD ME THAT I BETTER KEEP MY DICK HARD AT ALL TIMES WHEN SHE WAS AROUND, AND SHE CAN MAKE SURE I GET EXTRA TIME ON THE VISITING FLOOR, AND THAT I WILL BE ESCORTED ON TIME TO MY MEDICAL APPOINTMENTS. I SUFFERED PLENTY OF PAIN BECAUSE I TOLD BERMIER THAT I GOT PRIAPISM AND MY ERECTIONS ARE VERY PAINFUL, AND PLEASE DON'T ASK ME TO GET HARD EVERYDAY, BUT SHE DIDN'T CARE, SHE KEPT THREATINING ME WITH LOCKING ME INSIDE MY CELL FOR 23/HOURS A DAY LIKE THE COURT-ORDER STATES.

160. DEFENDANT WARDEN RENEE GAVE ORDERS TO C.O. PIERCE TO NOT MOVE ME TO A HEAT SENSITIVE HOUSING AREA, AND TOLD C.O. PIERCE TO MAKE SURE I FRY IN THE CELL



WARDEN RENEE TOLD ME IN JUNE OF 2022 THAT HE'S GOING TO MAKE SURE I DON'T GET ANYMORE FAMILY VISITS, AND I DID NOT GET VISITS FOR THEWHOLE SUMMER OF 2022, MY SON , MY GIRL, AND DAUGHTER WAS NOT ALLOWED TO VISIT ME EVEN THOUGH THEY TRIED THROUGHOUT THE SUMMER MONTHS. I ATTEMPTED SUICIDE JUST BECAUSE HE TOOK MY VISITS WITHOUT REASON.

161. ACCORDING TO COMMAND LEVEL ORDER 370.20 DEFENDANT(S) C.O. PIERCE, WARDEN RENEE TOLD ME THAT I MUST BE HANDCUFF, WAISTCHAIN, AND LEG SHACKLES WHEN I'M IN THE RECREATION CAGE, NO EXERCISE A VIOLATION OF MY CONSTITUTIONAL RIGHTS, C.O. CAPTAIN JONES MADE ME GO TO THE CLINIC WITH WAISTCHAIN, HANDCUFFS, AND LEG SHACKLES AND TOLD ME THIS IS THE WAY A CMC COURT-ORDER INMATE IS SUPPOSE TO BE TRANSPORTED INSIDE THE G.R.V.C. FACILITY, I TOLD HER I CAN'T GET FULLY EXAMINE LIKE THIS, AND SHE STATED SHE IS FOLLOW THE COMMAND LEVEL ORDER 370.20. I TOLD HER AND THE WARDEN ITS WRONG AND CAN THEY PLEASE STOP AND REVESED THE COMMAND LEVEL ORDER TO BE MORE HUMANE, WARDEN RENEE SAID (HELL NO ) WE ARE NOT CHANGING COMMAND LEVEL ORDERS JUST TO SUIT YOU.

162. WARDEN RENEE AND WARDEN SHERMA DUNBAR BOTH DEFENDANTS SAID I WILL NOT BE ALLOWED A KORAN, ONLY THE BIBLE. ACCORDING TO COMMAND LEVEL ORDER 370.20 THIS HURTED MY SINCERE HELD MUSLIM BELIEF. ALSO I WANTED TO GO TO JUMAH SERVICES, AND COULDN'T GO, DUE TO MY COURT ORDER 370.20 A VIOLATION OF MY 1ST ADMENDMENTS, ( RLUIPA ) PERSONS ACT 2000, AND THE IMAN WAS NOT ALLOWED TO VISIT ME TO GIVE ME SPIRITUAL STRENGHT.

163. DOCTOR ASKARI ~~XXXX~~ TALK TO ME THROUGH A CELL DOOR ABOUT MY PRIAPISM. AND THIS VIOLATED MY RIGHTS TO MEDICAL PRIVACY, OTHER INMATES HEARD HIM AND NOW I WAS A TARGET BY OTHER INMATES SAYING MY DICK IS ALWAYS HARD AND I'M A RAPIST AND THEY CAN'T WAIT TO CUT MY FACE. IF ONLY I WAS ALLOWED TO TALK TO THIS DOCTOR IN THE PRIVACY OF THE CLINIC I WOULD NOT HAVE A HIT OUT ON ME BY THE BLOOD NATION. THIS HAPPEN IN THE MONTH OF JUNE/2022.

164. DEFENDANT(S) WARDEN RENEE AND WARDEN SHERMA DUNBAR CREATED A POLICY THAT STOP ME FROM ATTENDING LAW LIBRARY, WHICH HINDER ME AND HURT ME BY NOT HAVING ACCESS TO THE COURTS AND ACCESS TO COUNSEL, BECAUSE I'M A PRO-SE LITIGANT IN MY CRIMINAL CASE, AND I SUBMITTED MOTIONS TO JUDGE JAMES BURKE, MANHATTAN CRIMINAL COURT, 100 CENTRE STREET, AND WAS DENIED ALL MY MOTIONS AND LOST MY RIGHT TO CONFRONT MY ACCUSER AT A SIRIOS HEARING DUE TO ME NOT HAVING ACCESS TO THE LAW LIBRARY LEXIS NEXIS OR LEGAL COORDINATOR, OR TO RESEARCH, DUE TO THE COMMAND LEVEL ORDER PUT INTO PLACE BY SHERMA DUNBAR AND ENFORCED BY WARDEN RENEE, WHEN I PLEADED WITH THEM AND NUMEROUS GRIEVANCES TELLING THEM I NEED FULL ACCESS TO THE LAW LIBRARY.

165. I PLAINTIFF WAS PLACE IN A COURT-ORDER LOCK DOWN HOUSE FOR PHONE RESTRICTIONS ONLY, THE ONLY PERSON I'M ALLOWED TO CALL IS MY LEGAL ADVISOR, MR. HARLAN GREENBERG, FOR THE ENTIRE 10 MONTHS I'VE BEEN IN G.R.V.C I HAVE NOT BEEN ALLOWED TO CALL MY LEGAL ADVISOR LIKE MY COURT-ORDER STATES, YOU WILL SEE BY LOG-BOOKS KEPT BY THE DEPARTMENT OF CORRECTIONS ONLY 5 TIMES A MONTH I WAS ALLOWED TO CALL MY LEGAL ADVISOR, BECAUSE WARDEN RENEE AND SHERMA DUNBAR MADE SURE I DIDN'T CALL MORE THAN THAT.

166. NEW YORK CITY CORRECTION DEPARTMENT, OPERATION SECURITY INTELLIGENCE UNIT, DESIGNATED PLAINTIFF AS A CENTRALLY MONITORED INMATE TO BE PLACE IN A CMC HOUSING UNIT WITH WAIST CHAINS AND LEG IRONS TO BE WORN WHEN OUTSIDE THE FACILITY AND DURING TRANSPORT. CLO 370.20 STATES THAT ITS PURPOSE IS TO ESTABLISH POLICY AND PROCEDURES FOR THE CARE, CUSTODY AND CONTROL OF THE INMATES UNDER COURT-ORDERED LOCKDOWN STATUS., THESE INMATES SHALL BE STRIP SEARCHED, AND THEIR PROPERTY CAREFULLY SEARCH ON THE DAILY BASIS, INMATES WILL MAKE ALL REQUEST FOR LAW LIBRARY IN WRITING, WHICH WILL BE FORWARDED TO THE SECURITY OFFICE WHO WILL OBTAIN COPIES OF THE REQUESTED MATERIALS AND PLACE SAME IN THE INMATE BLUE STORAGE BIN, THE COURT-ORDER LOCKDOWN INMATES ARE BARRED FROM VISITS AND PHONES CALLS TO ANYONE OTHER

THAN THIER ATTORNEY OF RECORD, ANY NECESSARY MEDICAL OR MENTAL HEALTH SERVICES ARE TO BE PROVIDED TO THESE INMATES IN THE HOUSING AREA 2/A. AND THEY WILL NOT BE REMOVED TO GO TO THE CLINIC UNLESS IT IS PHYSICALLY IMPOSSIBLE TO PROVIDE THEM WITH NECESSARY MEDICAL SERVICES IN THE CELL/HOUSING AREA, MENTAL HEALTH SERVICES, IF REQUIRED, WILL BE PROVIDED TO THEM IN THE HOUSING AREA, NOT THE CLINIC, AND INMATES MAY BE AFFORDED RECREATION IN ACCORDANCE WITH THE DETAILS DELINEATED IN THE COURT ORDER OR AS AMENDED IN A SEPARATE MEMO, AND THEY WILL BE RESTRAINED IN WAISTCHAINS HANDCUFFS AND MITTS WHENEVER THEY ARE OUT OF THIER CELLS FOR RECREATION, PLAINTIFF LEARN ABOUT CLO 370.20 ON OCTOBER/2021.

167. ALL PRISONERS ARE ENTITLED TO REASONABLE OBSERVANCE OF DIETARY LAWS, OR FAST ESTABLISHED BY THIER RELIGION, CORRECTIONAL PERSONNEL SHALL NEVER PROHIBIT DELAY OR CAUSE TO PROHIBIT OR DELAY INMATES ACCESS TO CARE OR APPROPRIATE TREATMENT. MINIMUM STANDARDS 3-02(B)(4); ALL MEDICAL TREATMENT OR PHYSICAL EXAMINATION SHALL OCCUR INSIDE OF APPROPRIATE TREATMENT AREAS..

168. DENIAL OF ACCESS TO THE COURT CREATED BY DOC STAFF WARDEN RENEE AND DOCTOR ASKARI, DOCTOR BALAM, HURSE BLOUNT, ON JULY /28/ 2022 JUDGE ROSS ISSUED A COURT-ORDER DIRECTING THAT I GET TESTED FOR THE MONKEYPOX, AND THE CORRECTION DEPARTMENT OFFICERS AND STAFF HAVE NOT ABIDIED BY THE JUDGE COURT-ORDER, WHICH PREVENT ME TO GET A BAIL BECAUSE I CAN'T COME INSIDE JUDGE ROSS COURTROOM UNLESS I GET TESTED.

169. PLAINTIFF REQUEST FOR LAWLIBRARY SERVICES WAS DENIED NUMEROUS TIMES MY PHONE RESTRICTIONS LOCK DOWN ORDER DOES NOT REQUIRE ME TO BE PLACE IN ENHANCED RESTRAINTS, WHICH WAS IMPOSED ON ME DUE TO COMMAND LEVEL ORDER 370.20 IN VIOLATION OF MY DUE PROCESS RIGHTS I WAS TREATED LESS THAN AN ANIMAL. WHEN MENTAL HEALTH CAME TO MY CELL DOOR TO EXAMINE ME HE VIOLATED MY PRIVACY RIGHT BECAUSE HE SAID THAT I HAVE P.T.S.D AND THE OTHER INMATES IN THE HOUSING UNIT SAID THEY GOING TO KILL ME BECAUSE I HAVE P.T.S.D AND NOBODY WITH P.T.S.D IS ALLOWED TO LIVE AROUND THEM, I HAD TO WATCH OUT FOR THE REMAINDER OF MY STAY IN UNIT.

I COULD NOT SLEEP FOR A WEEK STRAIGHT BECAUSE WHAT THE OTHER INMATES SAID THEY ARE GOING TO DO TO ME., I ASK THE MENTAL HEALTH STAFF PLEASE DON'T TALK MY BUSINESS THROUGH A CELL DOOR, AND HE SAID THIS IS HOW WE TREAT THIS HOUSING UNIT, WHO ARE COURT -ORDER LOCK DOWN.

170. ~~IN JUNE OF 2022 THERE WERE NUMEROUS FIRE IN HOUSING UNIT 4/BUILDING~~ THE SMOKE WAS SO THICK, I COULDN'T BREATHE AND FELT PAIN IN MY THROAT, I NEEDED IMMEDIATE MEDICAL ATTENTION AND I TOLD C.O. PIERCE THAT I NEED TO GET TO THE CLINIC FOR SMOKE INHALATION, HE LAUGHED AND SAID NO, I SUFFERED FOR MONTHS BECAUSE OF BREATHING TROUBLE FROM THE FIRE THAT WAS SET. I ALSO TOLD C.O. BERNIER ABOUT THE SMOKE THAT TRAP INSIDE MY CELL AND CAN SHE TAKE ME THE CLINIC FOR SMOKE INHALATION, AND SHE TOLD ME HELL NO, USE MY ASTHMA PUMP, I TOLD HER I RAN OUT AND ITS HARD FOR ME TO BREATHE, SHE TOLD ME I SHOULD HAVE NOT NEVER CAME TO JAIL, AND I SUFFERED THE PAIN FOR OVER 2 MONTHS.. I ALSO TOLD C.O. MASON ABOUT ANOTHER FIRE THAT TOOK PLACE IN THE SUMMER OF 2022 AND MASON TOLD ME YOU BETTER HOLD YOUR BREATH, I TOLD MASON THAT I CAN'T BREATHE BECAUSE OF THE THICK BLACK SMOKE AND CAN SHE PLEASE ESCORT ME TO THE CLINIC SO I CAN GET SOME MEDICAL HELP, AND SHE LOOK AT ME AND SAID I HAVE TO BE ESCORTED BY A CAPTAIN, AND NO CAPTAIN EVER CAME TO TAKE ME. BECAUSE C.O. MASON REFUSED TO CALL THE CAPTAIN OR CLINIC, I SUFFERED AND NOW I HAVE A BREATHING PROBLEM THAT WON'T GO AWAY.

171. I TOLD C.O. PIERCE AND C.O. MASON, AND C.O. BERNIER THAT I HAVE CHEST PAINS AND BREATHING DIFFICULTIES, THEY WILL NOT OPEN CELL DOOR EVEN WHILE I'M SUFFERING FROM SMOKE INHALATION. THIS HAPPEN IN MAY AND JUNE 2022

172. I PLAINTIFF WAS NOT ALLOWED TO TALK WITH THE ~~XXXX~~ OR IMAN FOR THE REASON THAT I'M A COURT ORDER LOCK DOWN INMATE, (RLUIPA) ALLOWS ME TO CONSULT WITH IMAN EVEN THOUGH I'M A COURT-ORDER LOCK DOWN INMATE, I COULD NOT EXERCISE MY RELIGION BECAUSE OF THESE RESTRICTIONS, HURT ME ~~THE~~ TREMENDOUSLY.

173. . . THIS PRISON PLAINTIFF IS HELD IN, DID NOT PERMIT AN OPPORTUNITY FOR PLAINTIFF TO ENGAGE IN RELIGIOUS ACTIVITIES, DUE TO SHERMA DUNBAR (CLO) COMMAND LEVEL ORDER POLICY. SUBSTANTIALLY BURDENING PLAINTIFF WITHOUT JUSTIFICATION. C.O. MASON, C.O. BERNIER, C.O. PIERCE, WARDEN RENEE, C.O. RUSSELL, C.O.

~~WALKER, C.O. LEECH~~ ALL I TOLD TO BRING ME TO SEE THE IMAN AND THEY SAID NO, THEN I ASK THEM TO BRING THE IMAN TO HOUSING UNIT 2/A AND THEY ALL SAID NO, WE DON'T CARE ABOUT THE MUSLIM FAITH.

174. C.O. MASON, C.O. PIERCE, C.O. KENOL, C.O. BERNIER, C.O. CAPTAIN ~~JOHNSON~~ JONES, C.O. WALKER, C.O. LEECH, C.O. RUSSEL, WARDEN RENEE I TOLD THEM THAT THE SHOWERS WAS FILTHY AND DIRTY BEYOND COMPARE AND THAT THEY NEED TO HAVE THE SHOWER TO GET POWER WASH AT LEAST 3 TIMES OUT THE WEEK SO INMATES DON'T GET FUNGUS ON THEIR FEET AND BODY, THEY ALL TOLD ME THAT I WILL NOT GET THOSE SHOWERS CLEAN, IF I FEEL THE SHOWERS ARE DIRTY THEN WASH IN YOUR SINK. I CAUGHT NUMEROUS FOOT FUNGUS BECAUSE THEY REFUSE TO CLEAN THE SHOWERS.

THE FUNGUS NEVER GOES AWAY, ITS BEEN PAINING ME FOR OVER TEN MONTHS, THERE IS POLICY IN DOC THAT SPECIFICALLY STATES SHOWERS ARE TO BE POWER WASH TO PREVENT INMATES FROM GETTING FUNGUS AND SICK AND DOCS REFUSES TO ADHERE TO THEIR OWN POLICIES. THIS FUNGUS MADE IT TO WHERE I CAN'T WALK PROPERLY.

175. AFTER I TOLD THESE OFFICERS AND WARDEN ABOUT THE HAZARD OF THE SHOWERS THEY INTENTIONALLY KEPT THE SHOWERS DIRTY, TO KEEP THE FUNGUS ON MY FEET, AND THEY FAIL TO ACT TO MITIGATE THE RISK DIRTY SHOWERS POSED TO MY FEET AND HEALTH. AND THEY MADE AND MAINTAINED THE SHOWERS DIRTY TO BE PUNITIVE TO COURT-ORDER LOCKDOWN INMATES.

176. PLAINTIFF AS OF 8/17/2022 THE MONKEYPOX VIRUS I HAVE IS GETTING MORE SEVERE. I FEEL LIKE IT GOING TO KILL<sup>LL</sup> ME IF I DON'T KEEP PRAYING TO ALLAH, MY SYMPTOMS ARE WORSENING DAILY AND STILL NO TREATMENT. I ALERTED MEDICAL STAFF AND THEY STILL REFUSE TO TREAT OR TEST ME OR VACCINATE ME. THE CHILLS AND SWEATS DAILY MY BODY TEMPS GOING UP AND DOWN, MY BLOOD PRESSURE ALWAYS HIGH, NON-STOP HEADACHES, SPITTING AND COUGHING UP BLOOD, I'M DYING SLOWLY



177. THE SMOKE INHALATION WHEN THEY HAD AFIRE IN 4/BUILDING I USUALLY WALK AROUND WITH MY ASTHMA PUMP, BUT RAN OUT AND THE SMOKE WAS TOO MUCH FOR ME TO BARE, C.O. PIERCE DID NOT CALL FOR AN MEDICAL EMERGENCY, NOR DID C.O. KENOL OR C.O. MASON, OR C.O. BERNIER THEY LEFT ME IN MY CELL TO DIE, I LAYED ON MY CELL FLOOR TRYING TO GET FRESH AIR FROM UNDER THE CELL DOOR. MY CHEST PAIN FELT LIKE IT WILL EXPLODE. AND C.O. PIERCE, C.O. MASON C.O. BERNIER, C.O. KENOL JUST SAT BACK AND WATCH ME JUST WALLOW IN PAIN. 72/HOURS LATER A NURSE SAID I REQUIRED TO BE TAKEN TO A HOSPITAL BECAUSE I WAS STILL IN PAIN AFTER 72 HOURS HAS GONE BY SINCE THE SMOKE, THEY NEVER TOOK ME TO THE HOSPITAL. IT TOOK A CAPTAIN 72/HOURS TO GET ME CHECK FOR THE SMOKE INHALATION FROM A BIG FIRE THAT HAPPEN IN THE ESH HOUSING 4/BUILDING. CAPTAIN JONES STATED TO ME AND C.O. PIERCE AND C.O. MASON, C.O. BERNIER, C.O. KENOL KNEW THE POLICY CONCERNING MEDICAL EMERGENCIES BUT THEY ARE GOING TO DO THINGS DIFFRENT BECAUSE I'M NOT DYING.

178. 6TH ADMENDMENT VIOLATION CONCERNING ME HAVING ACCES TO COUNSEL WAS IMPLEMENTED BY WARDEN RENEE, WARDEN SHERMA DUNBAR, C.O. PIERCE, C.O. MASON, C.O. KENOL, C.O. WALKER, C.O. LEECH, C.O. RUSSEL. BECAUSE I TOLD ALL OF THEM TO LIFT MY PHONE RESTRICTION BECAUSE I DON'T WANT TO BE A PRO-SE LITIGANT NO MORE, AND I NEED TO HIRE AN ATTORNEY TO REPRESENT ME AT MY UPCOMING TRIAL. AND THEY ALL TOLD ME ~~KNOW~~ NO, THEY DON'T CARE IF I <sup>WIN</sup> OR LOSE MY CASES, I DESERVE TO BE IN JAIL FOR THE REST OF MY LIFE. AND I CAN'T POSSIBLY PREPARE MY DEFENSE IF I'M NOT ALLOWED TO CALL FIRMS, AND I'M NOT ALLOWED TO GET PROSPECTIVE LAWYERS OUT THE LAW LIBRARY BECAUSE THEY NEVER BRING ME TO THE LAW LIBRARY SO I CAN TALK TO A LEGAL COORDINATOR., I'M CHALLENGING IN MOTIONS I SENT TO THE JUDGE ROSS EXPLAINING THAT I DON'T HAVE ACCES TO COUNSEL AND I DON'T HAVE ACCESS TO THE COURTS. THE COURTS MUST EVALUATE THE RESTRICTION CONSIDERING THE GOAL OF INSTITUTIONAL SECURITY, BELL-V-KINGSLEY, BELL, 441 U.S. AT 547; KINGSLEY-V-HENDRICKSON, 576 U.S. 389, 398 (2015) BUT REGULATIONS MUST BE REASONABLY NECESSARY TO ADDRESS THESE LEGITIMATE PENOLOGICAL CONCERNS.



179. PLAINTIFF ALSO WAS UNREASONABLY BURDEN BY NOT HAVING ACCES TO COUNSEL, BECAUSE TRIAL IS LOOMING AND I CAN'T REACH OUT TO LAW FIRMS TO MAKE A PITCH TO HIRE A DECENT LAWYER, I'M PRO-SE AND AT THIS STAGE I REALIZED BEING PRO-SE IS HARMFUL TO MY CASE AND I NEED EXPERT HELP IMMEDIATELY. TIME IS OF THE ESSENCE. HAVING ACCESS TO CALL ATTORNEY'S POSE NO PENALOGICAL CONCERNS. , I CAN'T COMMUNICATE WITH ATTORNEY USING THE MAIL BECAUSE I DON'T HAVE THE ADDRESS TO WRITE A NEW ATTORNEY LAW LIBRARY WON'T ALLOW COURT ORDER INMATES IN TO REASEARCH LAWYERS. AND SINCE I SUED WARDEN RENEE HE RETAILIATED BY TAKEN AWAY MY VISITS FOR OVER 3 MONTHS SO NOX LAWYER CAN COME VISIT ME., THE MOTIONS I ALREADY FILED FOR DISMISSAL OF MY CHARGES AND MOTIONS I SENT TO THE JUDGE REQUESTING I BE GIVEN A BAIL IS BEING IMPACTED NEGATIVELY BECAUSE I CAN'T STUDY OR PULL UP THE CORRECT CASE LAW TO SUBMIT WITH MY MOTIONS, SO ALL MY ,OTIONS ARE BEING DENIED DUE TO ME NOT BEING ABLE TO CONDUCT PROPER REBEARCH IN THE LAW LIBRARY.

180. PLAINTIFF ALSO WANT TO LET IT BE KNOWN THAT MY PRIVELAGE PHONE CALLS WITH MY ATTORNEY HAS BEEN EAVESDROP BY WARDEN RENEE, C.O. MASON, C.O PIERCE, C.O WALKER, C.O. LEECTH, C.O.KENOL ALL TOLD ME THAT THEY LISTEN TO WHAT ME AND MY LEGAL ADVISOPR TALKED ABOUT ALL THE TIMEX. AND THEY WILL CONTINUE TO DROP IN ON MY CONVERSATIONS WITH MY LEGAL ADVISOR BECAUSE THEY CAN DUE CHAT, AND THAT THEY BEEN LISTENING THE WHOLE TIME WHILE I WAS IN HOUSING AREEA 2/A. AND I'VE BEEN IN HOUSING UNIT 2/A FOR WELL OVER TEN MONTHS.

81. PLAINTIFF 14TH ADHEENDMENT VIOLATIONS, I HAVE BEEN DESIGNATED A CMC INMATE, AND PLACE INSIDE ENHANCE RESTRAINTS WITHOUT A HEARING, THE CLO WAS FRAUDULENT, AND I SHOULD HAVE NEVER BEEN DEEM A CMC INMATE, THIS WAS MY PUNISHMENT FOR AVING A RAPE CHARGE I WAS TOLD BY C.O. MASON, WARDEN RENEE, C.O.KENOL, C.O. ALKER, C.O.LEECTH, C.O. CAPTAIN JONES. THIS IS A SUBSTANTIAL DUE PROCESS IOLATION TO PLAINTIFF, THE CONDITIONS OF CONFINEMENT IMPOSED WERE TO ENFORCE COURT ORDER, WAS ILLEGAL. THE CLO WAS OVERBROAD AND INCONSISTENT WITH THE OAL OF THE LOCK DOWN ORDER.

FOR EXAMPLE HOW IS BEING PLACED IN ENHANCE RESTRAINTS DURING RECREATION /EXERCISE IS NECESSARY TO ACHIEVE THE MANDATE OF THE STATE COURT'S LOCKDOWN ORDER.

182. THE WARDEN HAD THE REQUISITE STATE OF MIND FOR THE ENTIRE 10 MONTHS PERIOD DURING WHICH EDWARDS WAS REQUIRED TO EXERCISE IN RESTRAINTS WHEN OUTSIDE HIS CELL, AND SO AS I.

183. THERE IS CLEARLY ESTABLISHED LAW THAT PLACING AN INMATE IN ENHANCE RESTRAINTS DURING EXERCISES INFRINGES ON THE RIGHT TO MEANINGFUL EXERCISE.

184. I WAS NEVER GIVEN AN HEARING TO THE REASONS WHY I'M AN ENHANCE RESTRAINT CMC INMATE , THIS IS A VIOLATION OF PLAINTIFF DUE PROCESS BY BOTH WARDENS RENEE AND SHERMA DUNBAR.

-----NO ACCESS TO MEDICAL CLAIMS-----

185. SINCE IVE PLAINTIFF HAS BEEN INCACERATED AND AS OF XXX 10/8/2021 IN G.R.V.C I HAVE BEEN NOT TAKENTO MY SCHEDULE FOLLOW UP APPOINTMENTS, I MISSED SO MANY APPOINTMENTS, INCLUDING ASTHMA APPOINTMENTS, HIGH BLOOD PRESSURE APPOINTMENTS, DENTAL APPOINTMENTS ITS HURTING MY HEALTH, ESPECIALLY MY MENTAL HEALTH, I HAD AN INCREASE IN PYSCH MEDS SINCE I FOUND OUT ABOUT DOC NOT ESCORTING ME TO MY MEDICAL APPOINTMENTS, I ATTEMPTED SUICIDE OVER 5 TIMES SINCE I'VE BEEN MISSING MY MEDS AND MEDICAL APPOINTMENTS DUE TO NO FAULT OF MY OWN, AROUND , JUNE /2022 I WAS TOLD BY WARDEN RENEE , C.O. MASON, C.O. BERNIER, C.O. WALKER, C.O. LEECTH AND C.O.KENOL, C.O. OIERCE THAT THEY WAS NOT GOING TO TAKE ME TO MY FOLLOW UP APPOINTMENTS IN THE CLINIC UNTIL I <sup>DO</sup> SOMETHING NICE FOR THEM LIKE DROP MY LAWSUITS., AND WHEN THEY DO BRING ME IT WILL BE IN ENHANCE RESTRAINTS, I TOLD THEM DON'T MAKE ME ENHANCE RESTRAINTS, THEY TOLD ME NO, YOU WILL SUFFER. I TOLD THEM PRISON OFFICIAL MUST CONDUCT PERIODIC REVIEWS TO DETERMINED WHETHER AN INDIVIDUAL REMAINS A SECHURITY RISK WARRANTING THE LIBERTY RESTRICTIONS, A CASE-BY-CASE FACTUAL ASSESSMENT COUPLED WITH THE PRISON CONDITIONS AND TENSIONS AT THE TIME, THEY TOLD ME I'M NOT WORTHY OF THAT TYPE OF ASS ESSMENT.

186. PLAINTIFF ALLEDGE THE CLO IS OVERBROAD AND NOT TAILORED FOR THE PURPOSE OF IMPLEMENTING THE LOCKDOWN ORDER, MY LOCKDOWN ORDER SAY NOTHING ABOUT RESTRICTING ME ACCESS TO RELIGIOUS TEXT,, THE LOCKDOWN ORDER DID NOT SPECIFICALLY MANDATE EHANCE RESTRAINTS DURING EXERCISE, THE CLO COMMAND LEVEL ORDER WAS OVERBROAD, THUS A PLAUSIBLE MONELL CLAIM IS STATED AS TO THE ASPECT OF THE CLO AS WELL.

187. THE POLICY MAKER OF CLO 370.20 SHERMA DUNBAR AND DEFENDANT WARDEN RENEE KNEW THAT POLICY CAUSE ME AN CONSTITUTIONAL INJURY, EVEN THE RISK OF INJURY. BUT THEY FAILED TO TAKE APPROPRIATE ACTIONS TO PREVENT OR SANCTION VIOLATIONS OF CONSTITUTIONAL RIGHTS. " JONES-V-TOWN OF EAST HAVEN, 691 F.3D 72, 81 (2D CIR. 2012 ) WARDEN RENEE AND SHERMA DUNBAR WAS AWARE AND WAS DELIBERATELY INDIFFERENT AND FAILED TO TAKE APPROPRIATE CORRECTIVE ACTION. MUNICIPAL LIABILITY CLAIM.1

188. NEGLIGENT ,HIRING , RETENTION, TRAINING AND SUPERVISION CLAIMS AGAINST WARDEN RENEE AND WARDEN SHERMA DUNBAR AGAINST CITY OF NEW YORK.

189. WARDEN RENEE AND WARDEN SHERMA DUNBAR ACTED OUTSIDE THE SCOPE OF THIER EMPLOYMENT, THEY WERE PERSONALLY INVOLVED IN THE VIOLATIONS OF MY CONSTITUTIONAL RIGHTS BY NOT ALLOWING ME TO GO TO THE CLINIC WHEN I WAS SCHEDULE FOR CLINIC APPOINTMENTS, BY NOT ALLOWING ME TO GET TREATED AND TESTED FOR THE MONKEYPOX VIRUS. AND NOT ALLOWING ME TO GET VACCINATED FOR THE MONKEYPOX VIRUS, AND THEY ARE RESPONSIBLE FOR ME NOT GETTING HEAT SENSITIVE HOUSING WHEN MY MEDICAL RECORDS STRICTLY CALLED FOR ME TO BE HOUSED IN A HEAT SENSITIVE HOUSING, WHICH CAUSED ME TO BE HOSPITALIZED DUE TO HEAT STROKES , FAINTING SPELLS, AND NUMEROUS ASTHMA ATTACKS.

190. PLAINTIFF ALLEDGE THAT WARDEN RENEE AND WARDEN SHERMA DUNBAR, C.O. MASON, C.O. PIERCE, C.O. RUSSEL, C.O . WALKER, C.O. LEECH, C.O. KENOL, C.O. CAPTAIN JONES RESTRICTED ME FROM CALLING MY LEGAL ADVISOR TO ONCE A WEEK, WHEN MY COURT -ORDER PHONE RESTRICTIONS DID NOT LIST A RESTRICTION IN HOW MANY TIMES A DAY THAT I CAN CONTACT MY ATTORNEY.

191. C.O. MASON, C.O. KENOL, C.O. PIERCE, C.O. BERNIER, C.O. WALKER, C.O. LEECH, C.O. RUSSEL, C.O. CAPTAIN JONES, WARDEN RENEE, WARDEN SHERMA DUNBAR ALL DEFENDANTS, INCLUDING CITY OF NEW YORK, CITY HEALTH AND HOSPITALS, ALL DENIED ME PLAINTIFF TO ADEQUATE MEDICAL CARE AND TIMELY MEDICAL CARE ITS WAS AN DELIBERATE INDIFFERENCE FROM ALL THE DEFENDANTS TO BRING ME TO MY SCHEDULE CLINIC APPOINTMENTS BUT REFUSE KNOWING MY HEALTH CONDITIONS AND THE ONGOING NEVER ENDING PAIN FROM VARIOUS AILMENTS INCLUDING LIVING WITH THE MONKEYPOX VIRUS FOR OVER A MONTH, WITH NO TREATMENT, LIVING IN A CELL WITH NO AIR CONDITIONER WHEN NEW YORK CITY HAS EXPERIENCE NUMEROUS HEAT WAVES 2022 SUMMER, AND I ALMOST DIED OVER TEN TIMES FROM ASTHMA ATTACKS AND FAINTING SPELLS CONTRIBUTING FROM THE INTENSE HEAT IN MY CELL WHICH WAS WELL OVER 90 DEGREES DAY AND NIGHT, I INFORMED ALL DEFENDANTS ABOUT MY MEDICAL NEEDS TO NO AVAIL, I EVEN TOLD THEM ABOUT MY MENTAL HEALTH STATUS, AND HOW MANY MISSED MENTAL HEALTH APPOINTMENTS I ENDURED BECAUSE THE DEFENDANTS REFUSED TO ESCORT ME TO THE CLINIC IN TIMELY FASHION.

192. DEFENDANTS, WARDEN RENEE, WARDEN SHERMA DUNBAR, C.O. MASON, C.O. BERNIER, C.O. KENOL, C.O. RUSSEL, C.O. WALKER, C.O. LEECH, C.O. CAPTAIN JONES, C.O. PIERCE WAS INFORMED OF THE FIRE THAT HAPPEN IN THE 4/BUILDING THAT SMOKE TRAVEL TO MY CELL AND I WAS DENIED MEDICAL ATTENTION BY ALL ABOVE DEFENDANTS.

193. DEFENDANTS CITY OF NEWYORK DID NOT ABIDE BY JUDGE COURT -ORDER TO TAKE INMATES TO MEDICAL APPOINTMENTS, DEFENDANTS ALL CORRECTION OFFICERS NAMED HEREIN DID NOT ABIDE BY JUDGE ELIZABETH TAYLOR COURT-ORDER DECEMBER/3RD/ 2021 ORDER TO PROVIDE INMATES ACCESS TO SICK CALL, AS A RESULT THE CITY WILL PAY INMATES 100\$ FOR EVERY MISSED MEDICAL APPOINTMENTS, AND OF THIS DATE THEY STILL NOT ADHERING TOTHE JUDGE RULING. I'M STILL SUFFERING BECAUSE WARDEN RENEE AND STAFF HERE ON RIKER'S ISLAND REFUSES TO COMPLY. DEPT,OF CORRECTIONS FAILED TO PROVIDE TIMELY TREATMENT TO ME WHICH CAUSE ME NEAR DEATH EXPERIENCES HERE AT RIKER'S ISLAND JAIL FACILITY,G.R.V.C,

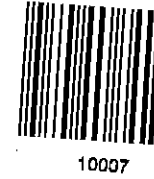
Sincerely  
 Kwaine Thompson  
 349-1901450

194. DEFENDANTS, CITY DID NOT ALLOW ME TO GET TREATMENT FOR SMOKE INHALATION FROM A FIRE THAT HAPPEN ON 8/16/2022 IN 10 BUILDING THE SMOKE WAS SO THICK IT TRAVEL TO HOUSING UNIT 2/A WHERE I'M HOUSED AND FILL MY CELL WITH THICK BLACK SMOKE I COULDN'T BREATHE, CHEST FELT LIKE IT WAS ON FIRE, LUNGS WAS IN PAIN AND THROAT HAD A BURNING, DOC STAFF TOOK ME TO THE CLINIC AROUND 9PM, ONCE IN THE CLINIC I WAS TOLD BY DOC STAFF AND MEDICAL STAFF, THAT I CAN'T GET NO MEDICAL ATTENTION BECAUSE I'M THE LAWSUIT GUY, AND I WAS THREATEN THAT IF I DID FILE A GREIVANCE OR I INSIST ON MEDICAL ATTENTION I WILL BE LOCKED IN MY CELL FOR 23/HOURS THE NEXT MORNING, AND THEY DON'T CARE HOW HOT MY CELL MIGHT BE KNOWING I'M A HEAT SENSITIVE INMATE.

195. DEFENDANTS CITY ON 8/17/2022 DENIED ME ACCESS TO THE COURTS, DOC STAFF, CAPTAIN LOUISEAU CAME TO MY CELL THIS MORNING AT 7:30AM WITH A VIDEO RECORDER AND RECORDED ME MAKING A STATEMENT ON VIDEO SAYING I WAS REFUSING COURT, I TOLD THEM THAT MY JUDGE ROSS SENT A COURT ORDER THAT I MUST GET TESTED FOR THE MONKEYPOX VIRUS TO BE TO STEP INSIDE HIS COURTROOM. THE DOC STAFF HAS FAILED ME IN GET ME TESTED FOR THIS VIRUS, HAS KEPT ME LONGER IN JAIL BY DELAYING MY COURT CRIMINAL PROCEEDINGS, THIS 2 MONTH DELAY IS BLAME ON DOC, AND CITY FOR NOT GET ME MEDICAL CARE IN A TIMELY FASHION, EVEN UNDER THE JUDGE COURT-ORDER THE DOC AND CITY REFUSE TO BUDGE AND GET ME TESTED, THIS HAS CAUSE ME TO SWALLOW 20 PILLS THIS MORNING TO TAKE MY OWN LIFE, I CAN'T TAKE HOW DOC HAS BEEN TREATING ME, I NEED TO GET HOME TO MY LOVE ONES.

Kwaine Thompson  
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